



<b>Total of Other Payments Paid to Administrative Claimants:</b>	\$12,981,392.94
<b>Estimated Total for Distribution to Priority Unsecured Creditors:</b>	TBD
<b>Estimated Percentage Dividend to Priority Unsecured Creditors:</b>	TBD
<b>Estimated Total for Distribution to General Unsecured Creditors:</b>	TBD
<b>Estimated Percentage Divided to General Unsecured Creditors:</b>	TBD
<b>Receipts to Date:</b>	\$13,509,434.85
<b>Disbursements to Date:</b>	\$12,981,392.94
<b>Current Balance in the Trustee's Accounts:</b>	\$528,041.91 <sup>2</sup>

In the above captioned Chapter 7 case, Stewart Robbins Brown & Altazan LLC (“SRBA”) rendered services in favor of Michael D. Warner, solely in his capacity as the Chapter 7 Trustee (the “Trustee”) for the above captioned jointly administered estates (collectively, the “Estates”) between October 1, 2024 and January 31, 2025 (the “Interim Application Period”). The fee statements for each month covered by the Interim Application Period can be summarized as follows:

<b>Invoices Circulated</b>				<b>Approved per Interim Compensation Procedures</b>		<b>Payments</b>
Invoice (Date)	Period Covered	Fees	Expenses	Fees (at 80%)	Expenses	Amount Paid
Inv. 1504 (12/9/24)	Oct. 1, 2024 – Oct 31, 2024	\$243,280.00	\$1,297.16	\$194,624.00	\$1,297.16	\$195,921.16
Inv. 1536 (1/30/25)	Nov. 1, 2024 – Nov. 30, 2024	\$204,200.00	\$7,895.05	\$163,360.00	\$7,895.05	\$171,255.05
Inv. 1594 (3/25/25)	Dec. 1, 2024 – Dec. 31, 2024	\$280,080.00	\$2,942.48	\$224,064.00	\$2,942.48	\$227,006.48
Inv. 1647 (5/21/25)	Jan. 1, 2025 – Jan. 31, 2025	\$216,810.00	\$4,214.56	\$173,448.00	\$4,214.56	\$177,662.56
<b>TOTALS</b>		<b>\$944,370.00</b>	<b>\$16,349.25</b>	<b>\$755,496.00</b>	<b>\$16,349.25</b>	<b>\$771,845.25</b>

<sup>2</sup> This is comprised of: (a) \$142,586.37 in the Trustee's checking account; (b) \$135,455.54 in the cash collateral account; and (c) \$250,000.00 in an account holding the proceeds generated from a sale to W&T Offshore.

The SRBA professionals and paraprofessionals who rendered services in favor of the Trustee during the Interim Application Period are:

Professional	Title	Year Licensed	Hours	Percent	Amount	Percent	Blended Rate
Abigail W. Mock	Associate	LA - 2024	383.40	19.86%	\$99,640.00	10.55%	\$259.89
Brandon A. Brown	Member	LA - 1998	114.40	5.93%	\$69,085.00	7.32%	\$603.89
Brooke W. Altazan	Member	LA - 2009	186.40	9.66%	\$93,560.00	9.91%	\$501.93
Kimberly A. Heard	Paralegal	N/A	66.10	3.42%	\$19,830.00	2.10%	\$300.00
Nicholas J. Smeltz	Associate	LA - 2019	112.60	5.83%	\$45,105.00	4.78%	\$400.58
Paul D. Stewart, Jr.	Member	LA - 1996	421.80	21.85%	\$256,445.00	27.16%	\$607.98
William S. Robbins	Member	LA - 1996	354.30	18.36%	\$214,180.00	22.68%	\$604.52
Jamie D. Cangelosi	Of Counsel	LA - 2000	291.20	15.09%	\$146,525.00	15.52%	\$503.18
<b>Total</b>			<b>1930.20</b>	<b>100.00%</b>	<b>\$944,370.00</b>	<b>100.00%</b>	<b>\$489.26</b>

The time and fees devoted to each ABA Bankruptcy Project Code during the Interim Application Period are as follows:

ABA Bankruptcy Project Task Code	Hours	Percent	Amount	Percent	Blended Rate
B110 Case Administration	6.40	0.33%	\$3,280.00	0.35%	\$512.50
B120 Asset Analysis and Recovery	33.10	1.71%	\$18,490.00	1.96%	\$558.61
B130 Asset Disposition	1492.20	77.31%	\$751,355.00	79.56%	\$503.52
B140 Relief from Stay/Adequate Protection Proceedings	16.90	0.88%	\$9,440.00	1.00%	\$558.58
B150 Meetings of and Communications with Creditors	2.80	0.15%	\$1,430.00	0.15%	\$510.71
B160 Fee/Employment Applications	76.30	3.95%	\$32,510.00	3.44%	\$426.08
B180 Avoidance Action Analysis	0.50	0.03%	\$280.00	0.03%	\$560.00
B190 Other Contested Matters	90.00	4.66%	\$39,450.00	4.18%	\$438.33
B210 Business Operations	14.50	0.75%	\$5,630.00	0.60%	\$388.28
B220 Employee Benefits/Pensions	67.50	3.50%	\$21,305.00	2.26%	\$315.63
B230 Financing/Cash Collections	9.90	0.51%	\$5,940.00	0.63%	\$600.00
B240 Tax Issues	3.70	0.19%	\$1,590.00	0.17%	\$429.73
B310 Claims Administration and Objections	115.70	5.99%	\$53,250.00	5.64%	\$460.24
B320 Plan and Disclosure Statement	0.70	0.04%	\$420.00	0.04%	\$600.00
<b>Total</b>	<b>1930.20</b>	<b>100.00%</b>	<b>\$944,370.00</b>	<b>100.00%</b>	<b>\$489.26</b>

The expenses incurred during the Interim Application Period are comprised of the following:

Expense	Amount
Copies	\$2,271.40
PACER	\$210.30
Service of Pleadings	\$8,130.26
Data Preservation	\$459.22
Corporate Records	\$2,768.16
Tax Records	\$4.00
EDI Costs	\$838.71
Filing Fees	\$338.00
Work Travel	\$416.60
Transcript Fees	\$912.60
<b>Total</b>	<b>\$16,349.25</b>

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:	)	
	)	Chapter 7
	)	
MLCJR LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-90324 (CML)
	)	
Debtors.	)	Jointly Administered
	)	
	)	

SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

<sup>1</sup> The debtors in these cases (the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

Stewart Robbins Brown & Altazan, LLC (“SRBA”), counsel to Michael D. Warner, solely in his capacity as the Chapter 7 Trustee (the “Trustee”) for the above captioned administratively consolidated estates (collectively, the “Estates”) hereby submits this *Second Interim Fee Application of Stewart Robbins Brown & Altazan LLC as Counsel to the Chapter 7 Trustee for the Period of October 1, 2024 through January 31, 2025* (the “Interim Application”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”).

### **RELIEF REQUESTED**

By this Interim Application, which encapsulates the period between October 1, 2024 through January 31, 2025 (the “Interim Application Period”), SRBA seeks interim approval and allowance, as an administrative expense, for the aggregate sum of \$960,719.25, which is comprised of:

- (i) compensation for professionals in the amount of \$944,370.00; and
- (ii) reimbursement of actual and necessary expenses in the sum of \$16,349.25.

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this Interim Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein include 11 U.S.C. §§ 330 and 331, FED. R. BANKR. P. 2014 and 2016, and Rule 2016-1 of the Local Rules.

### **PROCEDURAL BACKGROUND**

3. On May 14, 2023 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (“Court” or “Bankruptcy Court”).

4. On May 16, 2023, the Court entered that certain *Order Authorizing Joint Administration of the Chapter 11 Cases*<sup>2</sup> providing that the bankruptcy “cases are consolidated for procedural purposes only and shall be jointly administered by this Court under Case No. 23-90324 (CML).”<sup>3</sup>

5. On February 28, 2024, the Debtors’ bankruptcy cases (collectively, the “Bankruptcy Cases”) were converted to chapter 7 of the Bankruptcy Code.<sup>4</sup>

6. On February 29, 2024, the United States Trustee appointed Randy W. Williams as interim trustee (the “Interim Trustee”).

7. On April 22, 2024, the Court entered that certain *Order Granting Trustee’s Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee’s Professionals* (the “Interim Compensation Procedures Order”).<sup>5</sup>

8. On April 25, 2024, Amarillo National Bank (“Amarillo”), in its capacity as the administrative agent and collateral agent, acting at the direction of the Debtor-In Possession

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<sup>2</sup> Doc. No. 103. Unless otherwise specified, Doc. Nos. refer to Case No. 23-90324.

<sup>3</sup> While the above captioned bankruptcy case was pending under chapter 11 of the Bankruptcy Code, the Court entered that certain *Order Granting Complex Chapter 11 Bankruptcy Case Treatment* [Doc. No. 104] which provided “The Procedures for Complex Chapter 11 Cases in the Southern District of Texas apply to these cases.” These, however, are no longer applicable given this matter is now pending under chapter 7 of the Bankruptcy Code.

<sup>4</sup> Doc. No. 1720.

<sup>5</sup> Doc. No. 1831.

Lenders (the “DIP Lenders”) filed that certain *Emergency Motion for Entry of Agreed Order Resolving Disputed Election of Trustee Pursuant to Federal Rule of Bankruptcy Procedure 2003 and Enforcing Trustee Election Results*.<sup>6</sup>

9. On May 6, 2024, the Court entered that certain *Agreed Order Resolving Disputed Election of Trustee Pursuant to Federal Rule of Bankruptcy Procedure 2003 and Enforcing Trustee Election Results* providing that “Michael D. Warner shall be the permanent chapter 7 trustee in these Cases, subject to Mr. Warner’s ability to qualify under 11 U.S.C. § 322(a).”<sup>7</sup>

10. On May 8, 2024, the Trustee filed that certain *Notice of Bond and Acceptance of Election*.<sup>8</sup>

11. That same date, the Trustee filed that certain *Trustee’s Application for Order Authorizing Employment of Stewart Robbins Brown & Altazan, LLC as General Counsel* (the “Retention Application”), which sought this Court’s approval of the Trustee’s retention and employment of SRBA as general counsel.<sup>9</sup>

12. On June 12, 2024, the Court entered that certain *Order Granting Trustee’s Application for Order Authorizing Employment of Stewart Robbins Brown & Altazan, LLC* (the “Retention Order”),<sup>10</sup> which authorized SRBA’s employment *nunc pro tunc* May 6, 2024.

13. On November 27, 2024, SRBA filed that certain *First Interim Fee Application of Stewart Robbins Brown & Altazan LLC as Counsel to the Chapter 7 Trustee for the Period of May*

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<sup>6</sup> Doc. No. 1850.

<sup>7</sup> Doc. No. 1919.

<sup>8</sup> Doc. No. 1996.

<sup>9</sup> Doc. No. 1998.

<sup>10</sup> Doc. No. 2116.



6, 2024 Through September 30, 2024 (the “First Interim Application”),<sup>11</sup> seeking, for the period between May 6, 2024 and September 30, 2024 (the “First Period”) an award of \$854,160.00 in fees and \$46,005.49 in expenses, for a total of \$900,165.49.

14. On December 31, 2024, the Court entered that certain *Order Granting First Interim Fee Application of Stewart Robbins Brown & Altazan LLC as Counsel to the Chapter 7 Trustee for the Period of May 6, 2024 Through September 30, 2024* (the “First Interim Application Order”),<sup>12</sup> awarding SRBA, for the First Period, \$854,160.00 in fees and \$46,005.49 in expenses, for a total award of \$900,165.49.

### **COMPENSATION AND ITS SOURCE**

15. All services for which compensation is requested by SRBA were performed on behalf of the Trustee for the benefit of the Estates.

16. During the Interim Application Period, SRBA has received no payment and no promises for payment from any source other than the Estates for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Interim Application. There is no agreement or understanding between SRBA and any other person other than the partners of SRBA for the sharing of compensation to be received for services rendered in these chapter 7 cases.

17. SRBA’s individual fee statements for each month covered by the Interim Application Period are attached as **Exhibit “A”**. Each fee statement contains daily time logs describing the time spent by each attorney and paraprofessional for each month. The hourly rates set forth in the monthly fee statements are those customarily charged by SRBA for similar legal

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<sup>11</sup> Doc. No. 2301.

<sup>12</sup> Doc. No. 2336.

services. SRBA's fees for services rendered by lawyers, paralegals, and other professionals are customary and usual in the legal community in which SRBA practices. To the best of SRBA's knowledge, this Interim Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules. The fee statements for each month covered by the Interim Application Period can be summarized as follows:

Invoices Circulated				Approved per Interim Compensation Procedures		Payments
Invoice (Date)	Period Covered	Fees	Expenses	Fees (at 80%)	Expenses	Amount Paid
Inv. 1504 (12/9/24)	Oct. 1, 2024 – Oct 31, 2024	\$243,280.00	\$1,297.16	\$194,624.00	\$1,297.16	\$195,921.16
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<b>TOTALS</b>		<b>\$944,370.00</b>	<b>\$16,349.25</b>	<b>\$755,496.00</b>	<b>\$16,349.25</b>	<b>\$771,845.25</b>

18. The fee statements for each month covered by the Interim Application Period were circulated and no portion of the fees or expenses were objected to.

19. The Trustee, having reviewed this Interim Application, approves this Interim Application.

#### **ACTUAL AND NECESSARY EXPENSES**

20. During the Interim Application Period, SRBA incurred expenses in connection with its representation of the Trustee totaling \$16,349.25. These expenses are summarized in **Exhibit “B”**. SRBA bills clients at \$0.20 per page for photocopies. Additionally, the expenses incurred include the actual cost of automated research and courier service. Mileage is calculated at the rate accorded by the Internal Revenue Service. Conference call charges represent actual cost of conference calls. Automated research charges represent actual cost charged to SRBA. SRBA

submits that all effort was made to keep out-of-pocket expenses at a minimum and that such expenses are reasonable based on the services provided heretofore by SRBA.

### **SUMMARY OF SERVICES RENDERED**

21. The services rendered by SRBA during the Interim Application Period can be grouped into the categories set forth below. These categories are generally described in **Exhibit “C”**. Although every effort has been made to properly and consistently categorize the actual services provided into the appropriate category, certain tasks could be properly categorized into two or more task codes.

#### **a. B110 Case Administration**

**Fees: \$3,280.00 | Total Hours: 6.40**

This category includes all matters related to coordination and compliance, including the preparation of schedules and statements, monthly operating and other reports, contacts with the United States Trustee, and creditor inquiries. For instance, during the Interim Application Period, SRBA worked collaboratively with Rodney Dykes to analyze the current status of the Debtors’ Bankruptcy Cases and identify matters that need to be addressed to bring the Bankruptcy Cases to a conclusion. Additionally, SRBA addressed matters relating to the disposition and preservation of the Debtors’ records.

#### **b. B120 Asset Analysis and Recovery**

**Fees: \$18,490.00 | Total Hours: 33.10**

This category includes all matters related to the identification and review of potential assets including causes of action and non-litigation recoveries. During the Interim Application Period, SRBA examined the current status of several assets owned by the Debtors as well as those owned by their non-debtor subsidiaries and the ability to liquidate such assets for the benefit of the Estates.

Similarly, SRBA analyzed Natural Resources Worldwide, LLC's ("NRW") compliance with various regulatory requirements and the need to take corrective action.

**c. B130 Asset Disposition**

**Fees: \$751,355.00 | Total Hours: 1,492.20**

This category includes all matters related to sales, abandonment, and transaction work as to asset disposition. During the Interim Application Period, SRBA analyzed Estate assets that are burdensome or otherwise inconsequential and implemented measures to abandon the Estate's interests in such assets. One instance involved SRBA addressing numerous remaining matters stemming from NRW's acquisition of Estate assets while the Bankruptcy Cases were pending under chapter 11 of the Bankruptcy Code. In particular, NRW was not required by the asset purchase agreement to obtain regulatory approval of the assignment of federal oil and gas leases before the sale closed, which resulted in the liabilities continuing to be asserted against the Estate (such as a chapter 7 administrative expense claim against the Estate by the United States in the amount of \$11 million). After significant analysis of the various regulatory issues, SRBA moved to relinquish and abandon title to certain federal oil and gas leases due to NRW's non-compliance with its regulatory obligations. While this would later involve a full contradictory hearing, the parties would later (beyond the Interim Application Period) submit a stipulation and agreed order concerning the matter.

Additionally, SRBA analyzed the Estates' interests in various assets and engaged in negotiations with various parties to liquidate such assets.

**d. B140 Relief from Stay/Adequate Protection Proceedings**

**Fees: \$9,440.00 | Total Hours: 16.90**

This category includes all matters related to the termination or continuation of automatic stay under 362 and motions for adequate protection. During the Interim Application Period, SRBA communicated with a number of parties regarding lifting the automatic stay.

**e. B150 Meetings of and Communications with Creditors**

**Fees: \$1,430.00 | Total Hours: 2.80**

This category includes all matters relating to preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings. During the Interim Application Period, SRBA communicated with various parties regarding various issues.

**f. B160 Fee/Employment Applications**

**Fees: \$32,510.00 | Total Hours: 76.30**

This category includes all matters relating to the preparation of employment and fee applications for SRBA and other professionals and motions to establish interim procedures. During the Interim Application Period, SRBA prepared monthly fee statements for itself, the Estates' accountant, TPS West ("TPS"), as well as interim fee applications for itself and TPS. Similarly, SRBA analyzed the necessity to pursue formal employment of a non-testifying expert for the Trustee's special counsel.

**g. B180 Avoidance Action Analysis**

**Fees: \$280.00 | Total Hours: 0.50**

This category includes all matters relating to the review of potential avoidance actions under 11 U.S.C. §§ 544-549 to determine whether adversary proceedings are warranted. During the Interim Application Period, SRBA spent de-minimis time analyzing issues relating to chapter 5 causes of action.

**h. B190 Other Contested Matters**

**Fees: \$39,450.00 | Total Hours: 90.00**

This category includes all matters regarding the analysis and preparation of all motions, opposition to motions, and reply memoranda in support of motions, other than motions to assume or reject executory contracts and unexpired leases. During the Interim Application Period, SRBA assisted the Trustee with his preparation for mediation of the Hedron litigation. Similarly, SRBA analyzed and dealt with various litigants' requests to obtain records from the Estates and worked with a litigant who sought to take a Rule 30(b)(6) deposition of the Trustee in connection with litigation where the Debtors lifted, to a limited extent, the automatic stay.

**i. B210 Business Operations**

**Fees: \$5,630.00 | Total Hours: 14.50**

This category includes all matters regarding a debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems. In this particular matter, the Trustee is authorized to conduct limited operations. Thus, during the Interim Application Period, analyzed matters related to a number of monthly payables, such as Filelink, Veritrust, and Dartpoints.

**j. B220 Employee Benefits/Pensions**

**Fees: \$21,305.00 | Total Hours: 67.50**

This category includes issues regarding severance, retention, 401k coverage, and continuance of pension plans. During the Interim Application Period, SRBA continued to work with the Trustee's special counsel, Matthew J. Borrow, concerning the winddown and termination of Cox Operating's 401k plan and researched various issues related to the same.

**k. B230 Financing/Cash Collections**

**Fees: \$5,940.00 | Total Hours: 9.90**

This category includes matters under 361, 363, and 364 including cash collateral and secured claims, as well as loan document analysis. During the Interim Application Period, SRBA analyzed and revised a stipulation with the DIP Lenders to provide the Estates a carve-out from any sales of property subject to any liens of the DIP Lenders.

**l. B240 Tax Issues**

**Fees: \$1,590.00 | Total Hours: 3.70**

This category includes analyses and advice regarding tax-related issues, including the preservation of net operating loss carry forwards. During the Interim Application Period, SRBA spent de-minimis time addressing tax issues.

**m. B310 Claims Administration and Objections**

**Fees: \$53,250.00 | Total Hours: 115.70**

This category includes addressing specific claim inquiries, bar date motions, and analysis of, objections to, and allowance of claims. During the Interim Application Period, SRBA analyzed several requests for administrative expenses and prepared objections to the same. Similarly, SRBA conducted research concerning the procedural requirements to propound discovery on a governmental agency.

**n. B320 Plan and Disclosure Statement**

**Fees: \$420.00 | Total Hours: 0.70**

This category includes all matters related to the disclosure statement, plan formulation, presentation, and confirmation, as well as compliance with the plan confirmation order, related orders, and rules. It also includes matters related to disbursement and case closing activities, except those related to the allowance and objections to allowance of claims. During the Interim Application Period, SRBA spent de-minimis time on matters concerning this task code.

### **FACTORS SUPPORTING AWARD**

22. In *Sikes v. Crager (In re Crager)*, the Fifth Circuit instructed that the six factors found in 11 U.S.C. § 330(a)(3) are to be considered when awarding compensation to professionals.<sup>13</sup> Under § 330(a)(3) of the Bankruptcy Code, the court “shall consider the nature, the extent, and the value of such services, taking into account all relevant factors,” including –

(A) the time spent on such services;

(B) the rates charged for such services;

(C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

(D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.<sup>14</sup>

23. Thereafter, in *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, the Fifth Circuit rejected the “hindsight” or “material benefit” standard that was originally set forth in *Andrews & Kurth L.L.P. v. Family Snacks (In re Pro-Snax Distribs.)*,<sup>15</sup> and adopted a prospective standard based on whether the services of counsel were reasonably likely to benefit the estate at the time in which they were rendered.<sup>16</sup> All services rendered by SRBA satisfy the *Woerner* standard because they were reasonably likely to benefit the Estates at the time rendered. Similarly,

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<sup>13</sup> *Sikes v. Crager (In re Crager)*, 691 F.3d 671, 676 (5th Cir. 2012).

<sup>14</sup> 11 U.S.C. § 330(a)(3).

<sup>15</sup> *Andrews & Kurth L.L.P. v. Family Snacks (In re Pro-Snax Distribs.)*, 157 F.3d 414, 426 (5th Cir. 1998).

<sup>16</sup> *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266, 276 (5th Cir. 2015).



the following analysis of the § 330(a)(3) bolsters the conclusion that SRBA's services are for these chapter 7 cases are compensable under the Bankruptcy Code:

- a. **The Time and Labor Expended** - The charge for SRBA's services in this case for the Interim Application Period totals \$944,370.00. The actual time expended by SRBA in the Interim Application Period is set forth in detail in **Exhibit "A"** attached hereto. In addition, attached as **Exhibit "C"** is a breakdown by project of time expended on discrete matters during the progression of this case. SRBA believes the time spent performing legal services was commensurate with the factual and legal issues involved in the representation of the Trustee.
- b. **The Rate Charged for Such Services.** SRBA has applied for allowance of compensation for fees that reflect its billing rates charged to clients by SRBA and previously approved and/or set by courts in which SRBA has appeared. SRBA believes that its customary fees for services are equal to or below those of other firms in the national bankruptcy community and should be within the range of fees approved for attorneys of similar experience within this district.
- c. **Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title.** SRBA asserts that all services provided to the Trustee were necessary to the administration of and/or beneficial to the Estates at the time the services were rendered. Where SRBA deemed the time spent not to be a benefit, it either indicates "no charge" or "reduced" or, in some situations, did not put the time into its billing system.
- d. **Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed.** SRBA submits that the time put into this case is commensurate with the level of difficulty of the issues presented. When possible, particular projects have been handled by an associate or a partner with a lower billing rate.
- e. **With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field.** SRBA believes and respectfully submits that its attorneys are highly regarded as experts in the areas of bankruptcy, insolvency, corporate reorganization, and liquidation. The firm has extensive experience in handling bankruptcy and insolvency matters on behalf of trustees in bankruptcy cases and has acted as counsel to other trustees in other cases, as well as debtors, creditors, and committees.

24. To calculate an award of attorneys' fees, "[t]he Fifth Circuit uses the 'lodestar' method[.]"<sup>17</sup> The lodestar is the number of hours reasonably expended multiplied by "the prevailing hourly rate in the community for similar work."<sup>18</sup> The request for fees is then adjusted upward or downward based on the iconic "*Johnson* factors."<sup>19</sup> A description of the application of each of these factors relevant to this Application is set forth below.

- a. **The Novelty and Difficulty of Issues** - This case has presented issues of greater complexity than cases customarily brought before this Court.
- b. **The Skills Required for Performance of Services** – SRBA's attorneys have appeared before courts in this district, and throughout Louisiana and Mississippi, in bankruptcy cases on behalf of debtors, creditors, trustees, committees, and receivers for many years. SRBA believes and respectfully submits that it is highly regarded in the areas of bankruptcy law, commercial law, and the law of secured transactions. SRBA's attorneys possess the experience, reputation, and ability to merit an award of the requested compensation and reimbursement.
- c. **Preclusion from Other Employment** - While SRBA was not precluded from other employment during the Interim Application Period (aside from terminating its representation of a creditor while the Bankruptcy Cases were in Chapter 11), the professionals who have devoted time to this case were prevented from working on other matters.
- d. **The Customary Fees** - SRBA has applied for allowance of compensation for fees that reflect its billing rates charged to clients by SRBA. SRBA believes that its customary fees for services are equal to or below those of other firms in the national bankruptcy community and within the range of fees approved for attorneys of similar experience within Texas bankruptcy courts.
- e. **Contingent Nature of Fees** - These fees were contingent to the extent that all fees due counsel in a pending bankruptcy proceeding are contingent upon the success of the case, the availability of cash, review by the Office of the United States Trustee, Region 7, and the approval of the Court.

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<sup>17</sup> *Transamerican Nat. Gas Corp. v. Zapata P'ship (In re Fender)*, 12 F.3d 480, 487 (5th Cir. 1994) (citing *Shipes v. Trinity Indus.*, 987 F.2d 311, 319-20 (5th Cir. 1993), *cert. denied*, 510 U.S. 991 (1993)).

<sup>18</sup> *Fender*, 12 F.3d at 487 (citing *Shipes*, 987 F.2d at 319-20).

<sup>19</sup> *Fender*, 12 F.3d at 487 (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974)).

- f. **Time Limitations and Other Circumstances** – Intermittently throughout SRBA’s retention, it has had to handle exigent matters on an accelerated basis and implement appropriate solutions.
- g. **The Amount Involved and the Results Obtained** - SRBA submits that the amount sought is fully commensurate with the results obtained. SRBA respectfully submits that its services were, at the time rendered, believed to be necessary for and beneficial to the Estates and were rendered to protect and preserve the interests of the Estates during the pendency of the chapter 7 cases. As demonstrated herein, SRBA spent its time economically and without unnecessary duplication. The services were performed in an effective and efficient manner commensurate with the complexity, exigency, and importance of the issues involved.
- h. **Experience, Reputation and Ability** - The Trustee selected SRBA based on its extensive experience and knowledge of the legal matters likely to arise in chapter 7 cases, and, in particular, SRBA’s recognized expertise in the field of financial restructuring and bankruptcy.
- i. **The Undesirability of the Case** - This case was not undesirable.
- j. **The Nature and Length of the Professional Relationship with the Client** - SRBA has represented the Trustee since May of 2024. SRBA has also represented Michael D. Warner in his capacity as the KP Engineering Liquidation Trustee since 2020.<sup>20</sup>
- k. **Awards in Similar Cases** - SRBA avers that an order of compensation on the basis provided for is comparable to that awarded in similar cases in this district and in other Texas bankruptcy courts.

#### **CERTIFICATION OF COUNSEL**

25. By my signature on this Interim Application, I, Paul Douglas Stewart, Jr., do hereby certify that (i) I have read this application; (ii) to the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is in conformity with applicable guidelines, except as specifically noted in the application; and (iii) the compensation and expense reimbursement requested are billed at rates in accordance with

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<sup>20</sup> See Case No. 19-34698 (Bankr. S.D. Tex.).

practices no less favorable than those customarily employed by SRBA and generally accepted by SRBA's clients.

### **NOTICE**

26. Notice of this Interim Application has been provided to (a) those parties receiving notice via the Court's Electronic Case Filing system; and (b) by First Class U.S. Mail, postage prepaid, on the parties contained in Exhibit "B" to the *Trustee's Emergency Motion to Limit Notice* [Doc. No. 1754], as authorized by this Court's *Order Granting Trustee's Emergency Motion to Limit Notice* [Doc. No. 1794].

### **EXHIBITS TO INTERIM APPLICATION**

27. Additionally, attached to this Interim Application are the following:

- **Exhibit A**: SRBA's monthly invoices previously circulated under the Interim Compensation Procedures Order.
- **Exhibit B**: Aggregate amount of expenses requested in the Interim Application Period, categorized by type of expense.
- **Exhibit C**: Aggregate amount of fees requested in the Interim Application Period, categorized by task code.
- **Exhibit D**: Aggregate amount of fees requested in the Interim Application Period, categorized by professional and paraprofessional.
- **Exhibit E**: The Trustee's Form 2, entitled *Cash Receipts and Disbursements Record* ("**Form 2**"), evidencing that the Trustee has \$528,041.91<sup>21</sup> in cash on deposit as of August 18, 2025.

**WHEREFORE**, SRBA respectfully requests that the Court enter the Proposed Order: (a) approving the Interim Application; (b) allowing, on an interim basis as an administrative expense, compensation and reimbursement of expenses in the aggregate amount of \$960,719.25, as the sum

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<sup>21</sup> This is comprised of: (a) \$142,586.37 in the Trustee's checking account; (b) \$135,455.54 in the cash collateral account; and (c) \$250,000.00 in an account holding the proceeds generated from a sale to W&T Offshore.

of (i) compensation in the amount of \$944,370.00 and (ii) reimbursement of actual and necessary expenses in the amount of \$16,349.25; (c) allowing the Trustee to pay the balance of the aforementioned amounts; and (d) granting such other and further relief as this Court may deem just and proper.

Dated: August 27, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN & ALTAZAN, LLC**

By: /s/ Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
dstewart@stewartrobbins.com  
William S. Robbins (Tx. Bar # 24100894)  
wrobbins@stewartrobbins.com  
Brandon A. Brown (Tx. Bar # 24104237)  
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301 Main Street, Suite 1640  
Baton Rouge, LA 70801-0016  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467

***Counsel for Michael D. Warner, Chapter 7 Trustee***

**SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

**EXHIBIT “A”  
MONTHLY INVOICES**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**MLCJR LLC, *et al.*,**<sup>1</sup>

## Debtors

## Chapter 7

**Case No. 23-90324 (CML)**

## Jointly Administered

**SIXTH MONTHLY STATEMENT OF SERVICES RENDERED AND EXPENSES  
INCURRED FOR THE PERIOD ENDING OCTOBER 31, 2024 BY STEWART  
ROBBINS BROWN & ALTAZAN, LLC AS COUNSEL TO THE TRUSTEE**

Stewart Robbins Brown & Altazan LLC (“SRBA”), proposed counsel for Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”) for the above-captioned administratively consolidated estates (collectively, the “Estates”), hereby submits this Sixth Monthly Fee Statement for Services Rendered and Expenses Incurred (the “Monthly Fee Statement”) for the period ending October 31, 2024 (the “Statement Period”), in accordance with the Court’s *Order Granting Trustee’s Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee’s Professionals* [Docket # 1831] establishing interim compensation procedures (the “Interim Compensation Order”). In support of the Monthly Fee Statement, SRBA respectfully represents as follows:

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors' address is 4514 Cole Ave. Suite 1175, Dallas, Texas 75205.

1. SRBA respectfully submits this Monthly Fee Statement seeking compensation for reasonable, actual and necessary services and expenses rendered by SRBA on behalf of the Trustee during the Statement Period:

STATEMENT PERIOD SUMMARY	
Name of Applicant:	Stewart Robbins Brown & Altazan LLC
Applicant's Role in Case:	Chapter 7 Trustee's General Counsel
Date of Retention:	June 12, 2024 (Doc. 2116) retroactive to May 6, 2024
Period Covered by this Statement:	October 1, 2024 through October 31, 2024
Number Monthly Fee Statements:	Sixth
STATEMENT PERIOD SUMMARY OF FEES AND EXPENSES	
Total Statement Period Fees	\$243,280.00
Total Interim Fees (80%) Requested	\$194,624.00
Total Expenses Requested	\$1,297.16
Total Interim Remuneration Requested (exclusive of holdback):	\$195,921.16
STATEMENT PERIOD SUMMARY FOR ATTORNEYS	
Total attorney fees requested in this statement:	\$239,080.00
Total actual attorney hours covered by this statement:	326.90
Average hourly rate for attorneys:	\$540.00
STATEMENT PERIOD SUMMARY FOR PARAPROFESSIONALS	
Total paraprofessional fees requested in this statement:	\$4,200.00
Total actual paraprofessional hours covered by this statement:	136.6
Average hourly rate for paraprofessionals:	\$250.00

**In accordance with the *Order Granting Trustee's Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee's Professionals* [Docket no. 1831], each party receiving notice of the monthly fee statement will have until 5:00 p.m. (Prevailing Central Time), 10 days after the filing of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 10-day period, the Trustee is authorized to pay the professional the amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**



2. The following chart presents certain information regarding the SRBA professionals whose work on these chapter 7 cases compensation is sought in this Monthly Fee Statement sorted by professional, along with each professionals' title, earliest bar passage (if applicable), highest rate, blended rate, total amount billed, and percentage of billings:

Professional	Title	Date Initial Bar License	Total Time	Blended Rate	Highest Rate	Total Amount Billed	Percentage Billed
<u>Brandon A. Brown</u>	Member	LA - 1998	34.90	\$600.00	\$600.00	\$20,940.00	8.61%
<u>Brooke W. Altazan</u>	Member	LA - 2009	77.40	\$500.00	\$500.00	\$38,700.00	15.91%
<u>Kimberly A. Heard</u>	Paralegal	N/A	14.00	\$300.00	\$300.00	\$4,200.00	1.73%
<u>Nicholas J. Smeltz</u>	Associate	LA - 2019	13.70	\$400.00	\$400.00	\$5,480.00	2.25%
<u>Paul D. Stewart, Jr.</u>	Member	LA - 1996	106.20	\$600.00	\$600.00	\$63,720.00	26.19%
<u>William S. Robbins</u>	Member	LA - 1996	94.70	\$600.00	\$600.00	\$56,820.00	23.36%
<u>Abigail W. Mock</u>	Law Clerk	LA - 2024	122.60	\$200.00	\$200.00	\$24,520.00	10.08%
<u>Jamie D. Cangelosi</u>	Of Counsel	LA - 2000	57.80	\$500.00	\$500.00	\$28,900.00	11.88%
<b>Grand Total</b>			<b>521.30</b>	<b>\$459.44</b>	<b>\$600.00</b>	<b>\$243,280.00</b>	<b>100.00%</b>

3. The following chart provides a summary of fees incurred during the Statement Period sorted by ABA bankruptcy task code, along with the total time, percentage of time, total billed amount, and percentage of amount for each task:

Task	Total Time	Percent of Time	Total Amount	Percent of Amount
b110 Case Administration	2.8	0.54%	\$1,460.00	0.60%
b120 Asset Analysis and Recovery	21.2	4.07%	\$11,460.00	4.71%
b130 Asset Disposition	364.9	70.00%	\$181,400.00	74.56%
b140 Relief from Stay/Adequate Protection	11.3	2.17%	\$6,540.00	2.69%
b160 Fee/Employment Applications	22.6	4.34%	\$9,990.00	4.11%
b180 Avoidance Analysis	0.3	0.06%	\$150.00	0.06%
b190 Other Contested Matters	5.2	1.00%	\$2,420.00	0.99%
b210 Business Operations	3.4	0.65%	\$1,260.00	0.52%
b220 Employee Benefits/Pensions	51.1	9.80%	\$14,300.00	5.88%
b310 Claims Administration and Objections	38.3	7.35%	\$14,180.00	5.83%
b240 Tax Issues	0.2	0.04%	\$120.00	0.05%
<b>Grand Total</b>	<b>521.3</b>	<b>100.00%</b>	<b>\$243,280.00</b>	<b>100.00%</b>

4. The following chart provides a summary of expenses incurred during the Statement Period sorted by category of expenses:

SUMMARY OF EXPENSES	
Expense Description	Expenses Amount
Copies	\$134.60
Pacer	\$85.10
Service of Pleadings	-\$184.52
Data Preservation	\$438.72
Corporate Records	\$823.26
<b>Grand Total</b>	<b>\$1,297.16</b>

5. SRBA's invoice covering the Statement Period and providing a detailed statement of both (a) hours spent rendering legal services to the Trustee and (b) disbursements made or incurred by SRBA in connection with services performed on behalf of the Trustee during the Statement Period is attached hereto as **Exhibit "A"**.

6. Pursuant to the Interim Compensation Order, SRBA seeks payment of \$195,921.16 from the Trustee for the Statement Period, representing (a) 80% of SRBA's total fees for services rendered and (b) 100% of the total expenses incurred during the Statement Period.

7. Although every effort has been made to include all fees and expenses incurred during the Statement Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Statement Period. SRBA reserves the right to seek allowance of such fees and expenses not included herein.

Dated: December 13, 2024

Respectfully Submitted,

**STEWART ROBBINS BROWN  
& ALTAZAN, LLC**

By: /s/Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
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Brandon A. Brown (Tx. Bar # 24104237)  
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Telephone: (225) 231-9998  
Facsimile: (225) 709-9467

***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**MLCJR LLC, *et al.***  
**EXHIBIT A**

**DETAILED TIME AND EXPENSE ENTRIES**  
**Time Period – October 1, 2024 – October 31, 2024**



301 Main Street, Suite 1640  
Baton Rouge, LA 70821  
225-231-9998

Michael D. Warner  
440 Louisiana Ave., Suite 900  
Houston, TX 77002  
USA

December 9, 2024

File #: 119-001  
Invoice #: 1504

**RE:** In re MLCJR LLC & M21K, LLC

DATE	DESCRIPTION	Activity	LAWYER	HOURS	AMOUNT
10/1/2024	Call with B. Barriere and M. Warner re Hedron litigation (.5); review of, and comments and revisions to, MF Authority and related communications with M. Warner (1.0); review of, and comments and revisions to, Lender stip and related communications with W. Robbins and M. Warner (2.7); receipt and preliminary review of NRW Second Motion to Amend and related communications with M. Warner (.8);		PDS	5.00	3,000.00
10/1/2024	Draft/revise MFS's for TPS and SRBA.		PDS	1.10	660.00
10/1/2024	Review of, and comments and revisions to, objection to Genesis admin claim.		PDS	0.80	480.00
10/1/2024	Review/revise proposed stipulation with DIP Lender		WSR	1.00	600.00
10/1/2024	Revise records motion, analysis of pertinent issues and research re: same		BWA	3.30	1,650.00
10/1/2024	Revise objection to Genesis admin application(1.6), multiple emails with client re: same (0.3), review and analyze client comments (0.4), further revisions to objection in light of client comments (1.4)		BAB	3.70	2,220.00
10/1/2024	Receipt and review of agreed order entered by court re: Turner MRS, emails with D. Whitmore re: same		BAB	0.30	180.00
10/1/2024	Email to B. Cueria re: stipulation on MRS		BAB	0.10	60.00
10/1/2024	Finalize MF Authority and related Order for filing.		KAH	0.20	60.00
10/1/2024	email to N. Walden & J. Morris (FBI) re asset recovery petition	A108	NJS	0.10	40.00
10/1/2024	email to M. Warner re status of asset recovery petition	A108	NJS	0.10	40.00
10/1/2024	Review/revise APA with W&T for GI 18 (1.3); Analysis of additional due diligence issues SPWD Gathering (1.4)		WSR	2.70	1,620.00
10/1/2024	Review and revise Motion to Abandon records (2.2); email from Mr. Kuebel regarding ConocoPhillips (.2)		WSR	2.40	1,440.00
10/1/2024	Continued research re denials of administrative expenses.		AWM	2.70	540.00
10/1/2024	Correspondence from L. Landry re: stored documents, analysis of same		BWA	0.20	100.00
10/1/2024	Multiple emails with S. Allen re: Liberty audit and request for documents relating to same		BAB	0.40	240.00

10/2/2024	Attention to finalizing September payables spreadsheet; email to R. Dykes re same; emails to PDS and WSR re vendor invoices.		KAH	0.40	120.00
10/2/2024	prepare for and conduct meeting with Firm and R. Dykes to discuss open issues (2.2); prepare for and attend meeting with R. Dykes, W. Robbins, and Highlander to discuss potential settlement and related communications with M. Rubenstein, L. Phillips, and M. Warner (2.3); communication with M. Warner re non-debtor subsidiary issues (.4); review of, and comments and revisions to, assignments from NRW and related communications with M. Warner and A. Mendez (.3);		PDS	5.70	3,420.00
10/2/2024	Attention to relinquishment and decommissioning orders		BWA	0.20	100.00
10/2/2024	Review and revise affidavit of R. Dykes re: Genesis admin app, confer with Mr. Dykes re: same		BAB	0.60	360.00
10/2/2024	Emails with B. Cueria re: revisions to stipulation (0.2), compare to prior version and analyze changes(0.5), revise Stipulation (1.0) and email to B. Cueria re: reason for rejection of some changes and revisions made (0.4)		BAB	2.10	1,260.00
10/2/2024	Telephone conference with client re: filing of objection (0.2); multiple emails with J. Rawlings re: need to discuss issues moving forward on Genesis admin app (0.3); review and analyze litigation needs, discovery needs for Genesis app (0.7)		BAB	1.20	720.00
10/2/2024	meeting with D. Stewart, B. Altazan, W. Robbins, B. Brown, A. Mock, and R. Dykes re case status and tasks moving forward	A111	NJS	1.10	440.00
10/2/2024	Review / revise proposed order on Abandonment motion (.4); Emails and tc with Trustee regarding proposed stipulation (.3); emails to/from Steven Levitt (.4); Review revised PSA for GI 18 (.5); conference with W&T Counsel regarding same (.5); Meeting with Highlander group regarding proposed transaction (.6); tc with Trustee regarding same (.3); Analysis and email to/from Mr. Knapp regarding IBLA appeals issues in abandonment (.4)		WSR	3.40	2,040.00
10/2/2024	Review records motion meeting with Mr. Dykes regarding same (1.1); Team meeting regarding pending issues (.5)		WSR	1.60	960.00
10/2/2024	Meeting with R. Dykes; organize evidence, draft and revise objection to Genesis admin claim and related communications with R. Dykes.		AWM	5.40	1,080.00
10/2/2024	Communication with Trustee re: Dartpoints and Filelink invoices, analysis of same (.70); Team meeting re: outstanding case issues, and resolution of same (1.20)		BWA	1.90	950.00
10/2/2024	Attention to analysis necessary to amend abandonment motion exhibit (.50); Meeting with R. Dykes re: records motion (.40)		BWA	0.90	450.00
10/2/2024	Prepare for and attend meeting with R. Dykes re: status of various projects and needs moving forward		BAB	1.10	660.00
10/2/2024	Final revisions to objection to Genesis application		BAB	0.70	420.00

10/2/2024	Emails with client re: Liberty Mutual doc requests for audit, telephone conference with client re: same (0.4); confer with R. Dykes re: Liberty document requests, status and location of documents (0.5)	BAB	0.90	540.00
10/3/2024	Finalize for filing SRBA and TPS August Monthly Fee Statements	KAH	0.20	60.00
10/3/2024	investigate subsidiary corporate issues	WSR	1.00	600.00
10/3/2024	communication with R. Kuebel re (i) abandonment motion, (ii) authority motion, and (iii) potential sales from non-debtor sub and related communications with M. Warner (.8); revisions to proposed order on abandonment motion and related communications with W. Robbins, K. Hines, and M. Warner (1.4); diligence search in digital archive for information relating to non-debtor subsidiaries (1.8).	PDS	4.00	2,400.00
10/3/2024	Reviewing documents re Erath Inventory	AWM	0.10	20.00
10/3/2024	Analysis of relinquishment/decom dates (1.20); Attention to notice of destruction (.10); Continue revising records motion and related proposed order (1.10)	BWA	2.40	1,200.00
10/3/2024	Telephone conferene with S. Thomas re: Genesis admin app	BAB	0.50	300.00
10/3/2024	Emails with A. Vincent re: London broker commissions and chapter 11 admin process	BAB	0.60	360.00
10/3/2024	Draft and revise litigation hold letter to Genesis (1.5); email to client re: same (0.1)	BAB	1.60	960.00
10/3/2024	Prepare for and participate in telephone conference with client and M. Borrer re: 401k plan termination issues (0.8); draft winddown budget for professional fees, circulate to client and M. Borrer (0.7)	BAB	1.50	900.00
10/3/2024	Emails with client re: status of MRS filed by Cueria client	BAB	0.20	120.00
10/3/2024	Emails with M. Borrer re: form 5500, review same	BAB	0.40	240.00
10/3/2024	review and revise records motion (1.4); Telephone conference with Mr. Kuebel regarding additional records and sale interests (.3)	WSR	1.70	1,020.00
10/3/2024	email from/to Rodney Dykes regarding new developments in Erath inventory (.4); review and analyze pending issues as to Erath (1.2); analyis of additional sale / ownership issues (.7)	WSR	2.30	1,380.00
10/3/2024	Researching and requesting multiple non-debtor affiliated entities' corporate formation documents.	KAH	2.10	630.00
10/3/2024	Drafting Request for Discovery to Genesis	AWM	3.00	600.00
10/3/2024	Communication with W. Robbins re Erath Inventory	AWM	0.30	60.00
10/3/2024	Updating Exhibit Leases, ROWs and ROEs spreadsheet for Abandonment Motion	AWM	2.00	400.00
10/3/2024	Review Schedules, update exhibit to abandonment motion with any missing leases/ROWs/Rues and confirm whether sold to date	BWA	4.40	2,200.00
10/3/2024	Attention to obtaining and compiling organizational docs (.80); Communication with Trustee re: storage invoices (.10)	BWA	0.90	450.00

10/3/2024	Telephone conference with client re: Liberty Mutual doc request		BAB	0.30	180.00
10/4/2024	communication with M. Crocker re Tiger Shoals (SMI 217A) and NRW's Second Motion to Amend.		PDS	0.10	60.00
10/4/2024	review of, and comments and revisions to, exhibit 3 to proposed order on motion to abandon, reject, and compromise and related communications with K. Hines (1.6); detailed review of NRW Motion to Amend and commencement of diligence for Trustee's response (2.2); communication with M. Jones re Highlander transaction (.2); receipt and preliminary review of Kinchen chapter 11 adm claim and related communications with M. Warner, B. Brown, and A. Mock (.3).		PDS	4.30	2,580.00
10/4/2024	Emails with client re: lit hold letter to Genesis, review and analyze forms provided by client that client wishes to model upon		BAB	0.50	300.00
10/4/2024	emails to/from and Telephone conference with Mr. Levitt regarding Devon demand / need for bond claim (.4); review revised Stipulation from Mr. Levitt and forward same to Trustee (.4); follow up email to/from Mr. Levitt regarding bond details (.2); review and analysis regarding trust account / Devon issues (.5); review and analyze appeal dismissal issues in abandonment motion (.5); email forwarding A Port offer on immovable property (.4); review and analysis of subsidiary issues (1.0); emails regarding Iron Mountain and other records issues (.2)		WSR	3.60	2,160.00
10/4/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet		AWM	0.90	180.00
10/4/2024	Revise Litigation Hold Letter to Genesis		AWM	1.10	220.00
10/4/2024	Reviewing documents re Erath Inventory		AWM	0.40	80.00
10/4/2024	Review Schedules, update exhibit to abandonment motion with any missing leases/ROWs/Rues and confirm whether sold to date		BWA	3.90	1,950.00
10/4/2024	Communication with J. Doyle re: Iron Mountain documents, analysis of same (.50); Communication from A. Carr re: Veritrust invoices (.10)		BWA	0.60	300.00
10/5/2024	Reviewing documents re Erath Inventory		AWM	1.50	300.00
10/5/2024	Revisions to Litigation Hold Letter to Genesis		AWM	0.90	180.00
10/7/2024	Attention to payables; update spreadsheet; emails related to same.		KAH	0.20	60.00
10/7/2024	draft and revise first interim fee application of SRBA	DR	NJS	1.90	760.00
10/7/2024	Continue revising records motion		BWA	1.40	700.00
10/7/2024	Communication with Trustee re: Kitchens' filed admin claim		BWA	0.70	350.00
10/7/2024	Receipt of corporate formation docs from DE SOS related to non-debtor entities.		KAH	0.30	90.00
10/7/2024			AWM	0.40	80.00
	Editing Litigation Hold Letter to Genesis				



10/7/2024		AWM	2.30	460.00
	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet			
10/7/2024	Reviewing documents re Erath Inventory and began drafting memo	AWM	3.60	720.00
10/7/2024	Drafting objection to Creditor Benjamin Kitchen's Chapter 11 Admin Claim	AWM	1.50	300.00
10/7/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	2.10	420.00
10/7/2024	Review Schedules, update exhibit to abandonment motion with any missing leases/ROWs/Rues and confirm whether sold to date	BWA	2.70	1,350.00
10/7/2024	Attention to September payables (.50); Attention to acquisition of organizational documents (.10)	BWA	0.60	300.00
10/7/2024	Review and analyze latest draft of litigation hold letter to Genesis	BAB	0.30	180.00
10/7/2024	Analysis of Kitchen admin claim and letter re: same	BAB	0.40	240.00
10/8/2024	Comparison of ConocoPhillips executed NDA to form.	KAH	0.40	120.00
10/8/2024	Revisions to September invoice/correct billing codes	KAH	1.30	390.00
10/8/2024	review/analyze subsidiary documents (1.2); review revised Huber NDA and email to Mr. Long regarding same (.7); review proposed ConocoPhillips Nda (.5); review and analyze and revise proposed NRW Third Amendment, Assignmetns of ROW and DOO and communications to/from NRW counsel (2.3); emails regarding Venice Energy issues (.3); review and forward Talos response (.4)	WSR	5.40	3,240.00
10/8/2024	continued critical review of NRW Second Motion to Amend and related communications with M. Warner and R. Kuebel.	PDS	3.70	2,220.00
10/8/2024	Review and revise objection to Kitchens' ch 11 admin claim	BAB	0.40	240.00
10/8/2024	Search and pull entity documents from server data.	KAH	0.30	90.00
10/8/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	1.10	220.00
10/8/2024	Drafting letter to Creditor Benjamin Kitchen re his chapter 11 admin claim	AWM	1.70	340.00
10/8/2024	Edited objection to creditor Benjamin Kitchen's chapter 11 admin claim	AWM	4.20	840.00
10/8/2024	Continued drafting memo re Erath Inventory	AWM	0.30	60.00
10/8/2024	Review/analyze proposed revisions to Huber NDA (.50); Analyze ConocoPhillips' access to Veritrust records (.50)	BWA	1.00	500.00
10/9/2024	Prepare for and conduct Zoom with Interior re abandonment and NRW issues.	PDS	1.30	780.00
10/9/2024	Review revised objection to Kitchens admin exp app	BAB	0.30	180.00
10/9/2024	Emails with B. Cueria re: status of stipulation on MRS	BAB	0.20	120.00
10/9/2024	Continue editing objection to creditor Benjamin Kitchen's chapter 11 admin claim	AWM	0.30	60.00

10/9/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	5.10	1,020.00
10/9/2024	conference call with regulators regarding abandonment and NRW issues (.5); review and analyze requested NRW DOO's (.6); emails to/from NRW counsel regarding DOO's (.3); emails and tc with Trustee regarding NRW ROW assignments and amendment to PSA and meeting regarding check exchange (.6); tc with Mr. Eisenberg regarding Devon stipulation (.3); analysis of various sale issues (1.5)	WSR	3.80	2,280.00
10/10/2024	revised and filed Notice of Amended Exhibit and related communications with B. Knapp and M. Warner.	PDS	0.70	420.00
10/10/2024	Email from Dart Points re status of payment; review payables; respond to email.	KAH	0.20	60.00
10/10/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	1.50	300.00
10/10/2024	Communication with FileLink and Veritrust re: invoices	BWA	0.30	150.00
10/11/2024	Emails with B. Cueria re: status of stipulation on MRS	BAB	0.10	60.00
10/11/2024	Receipt and review of OG stipulation as to Devon stay relief	BAB	0.10	60.00
10/11/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	2.00	400.00
10/11/2024	emails to/from NRW counsel regarding various corrective documents; email to Trustee regarding same	WSR	0.40	240.00
10/14/2024	Attention to payables; updating spreadsheet with payables to date; emails related to same.	KAH	0.40	120.00
10/14/2024	Prepare expense details for fee app.	KAH	0.50	150.00
10/14/2024	reviewed docket and drafted CONA for Motion for Authority of non-debtor subsidiaries and related communications with K. Heard (.5); prepare for and meeting with J. Cangelosi and A. Mock re NRW Motion to Amend and Trustee's opposition (.8); communication with W. Robbins and M. Warner re DOO's requested by NRW (.1); detailed review of Records Motion and related communications with B. Altazan (1.3); communication with A. Long re Huber's opposition to Abandonment motion (.3); summary of oppositions to the Trustee's Abandonment motion and related communications with M. Warner and W. Robbins (1.4); communication with M. Bishop and E. Ropley re their clients' oppositions to Abandonment motion (.3);	PDS	4.70	2,820.00
10/14/2024	Draft/revise September MFS for SRBA and TPS-West and related communications with K. Heard.	PDS	1.10	660.00
10/14/2024	conference call with DIP Agent counsel and Talos counsel regarding setoff issues (.4); tc with Mr. Dykes and review and forward revised spreadsheet (.5)	WSR	0.90	540.00
10/14/2024	Review and analyze NRW's second motion to amend sale order approving sale agreement, other relevant pleadings and facts.	JDC	9.60	4,800.00
10/14/2024	Analysis of Kitchen admin claim motion and response, communication with Trustee re: same	BWA	1.30	650.00

10/14/2024	Revise letter to Mr. Kitchens re: admin claim	BAB	0.30	180.00
10/14/2024	Review latest draft of response to Kitchens admin claim, emails with client re: same, finalize and file same	BAB	0.40	240.00
10/14/2024	Study email from M. Borrer re: plan expenses and DOL guidance on same, review documents attached to email	BAB	1.20	720.00
10/14/2024	Receipt of approval for FileLink and Veritrust invoices; emails related to same; revise payables spreadsheet.	KAH	0.30	90.00
10/14/2024	Drafting memo re Erath Inventory	AWM	3.00	600.00
10/14/2024	Meeting with Doug and Jamie re NRW Second Motion to Amend PSA	AWM	0.50	100.00
10/14/2024	Conducting research on mutual mistake defense	AWM	3.60	720.00
10/14/2024	Finalized Objection to Creditor Benjamin Kitchen's Chapter 11 admin claim & sent to B. Brown	AWM	0.30	60.00
10/14/2024	Continued updating Exhibit Leases, ROWs and ROEs spreadsheet	AWM	1.20	240.00
10/14/2024	Met with W. Robbins re Erath Inventory	AWM	0.10	20.00
10/14/2024	Began drafting memo on mutual mistake defense	AWM	0.70	140.00
10/14/2024	Email to/from Exxon counsel and review NDA revisions (.4); email with additional revisions and with information on records (.5); analysis and emails to/from Zimmerman regarding Data center destruction (.4); review emails and telephone message regarding equipment issues (.4)	WSR	1.70	1,020.00
10/14/2024	Emails and tc regarding NRW requested DOO (.4); review and analyze proposed new language from objectors for abandonment order (.3); review and analyze Erath inventory issues (1.2); review and analyze corporate authority issues (1.3)	WSR	3.20	1,920.00
10/14/2024	Review/revise Exxon's redlines to NDA, attention to requested inventory (1.10); Attention to monthly payables and payment of same (1.80); Attention to records motion status and review (.40)	BWA	3.30	1,650.00
10/14/2024	Attention to wrapping schedules review/updating abandonment motion exhibit re: leases/ROWs/Rues	BWA	0.60	300.00
10/14/2024	Email from B. Smith re: new suit against Cox	BAB	0.50	300.00
10/15/2024	Additional revisions to Sept invoice.	KAH	0.20	60.00
10/15/2024	Receipt of R. Dukes activity report; update October payables.	KAH	0.10	30.00
10/15/2024	Attention to predecessor document request (EP); forwarding of docs and links to same.	KAH	0.30	90.00

10/15/2024	Prepare for and conduct firm-wide meeting on liquidation with R. Dykes (1.4); meeting with E. Ripley re opposition to abandonment motion (.5); meeting with M. Crocker re opposition to abandonment motion (.5); analysis of NRW Motion to Amend in preparation for upcoming meeting with litigation team (1.6); meeting with J. Cangelosi, A. Mock, and R. Dykes re NRW Motion to Amend (1.3); communication with R. Dykes and W. Robbins re assets to be sold (.4); review of, and comments and revisions to, records motion and related communications with B. Altazan (.7); review of, and comments and revisions to, amended exhibit 1 to proposed order to abandonment motion (.9);		PDS	5.90	3,540.00
10/15/2024	continue drafting/revising SRBA first interim fee application	DR	NJS	1.60	640.00
10/15/2024	Review and analyze NRW's second motion to amend sale order approving sale agreement, other relevant pleadings and facts, draft opposition.		JDC	8.30	4,150.00
10/15/2024	Pulling hearing transcripts for J. Cangelosi on NRW matter		KAH	0.20	60.00
10/15/2024	meeting with D. Stewart, W. Robbins, B. Brown, B. Altazan, A. Mock, and R. Dykes re sale and NRW issues	A111	NJS	0.80	320.00
10/15/2024	meeting with D. Stewart, W. Robbins. B. Brown, B. Altazan, N. Smeltz and R. Dykes re sale and NRW issues.		AWM	0.80	160.00
10/15/2024	Drafting memo re mutual mistake research		AWM	2.80	560.00
10/15/2024	Editing memo re Erath Inventory		AWM	0.20	40.00
10/15/2024	Meeting with D. Stewart, J. Cangelosi, and R. Dykes re NRW Second Motion to Amend PSA		AWM	0.90	180.00
10/15/2024	Meeting with W. Robbins and R. Dykes re Erath Inventory		AWM	0.80	160.00
10/15/2024	Conference with Mr. Dykes and review of Talos issues; email to DIP Agent counsel regarding same		WSR	0.70	420.00
10/15/2024	Team meeting regarding pending issues; (1.8); analysis of Erath issues and conference with Mr. Dykes regarding same (1.3); review Veritrust inventory and forward same to various parties; emails to/from Cliff Carlson regarding predecessor records; review and forward records links (.3); emails regarding NRW DOO request (1.7); review of pleadings and other materials, and analysis of Subsidiary issues; follow up email to DIP Agent counsel regarding subsidiary issues (.7)		WSR	5.80	3,480.00
10/15/2024	Compile lease/ROW/Rue analysis spreadsheets		BWA	2.10	1,050.00
10/15/2024	Team meeting re: outstanding issues and resolution of same (.80); Analysis of and attention to outstanding payables (1.20); Attention to subsidiary organizational documents (.30); Communication with R. Dykes re: Veritrust inventory for records motion (.20)		BWA	2.50	1,250.00
10/15/2024	Meeting with R. Dykes re: outstanding matters		BAB	0.80	480.00
10/16/2024	Forward payables to Trustee's Office; emails related to same.		KAH	0.10	30.00
10/16/2024	Finalize SRBA and TPS September monthly fee statements		KAH	0.20	60.00

10/16/2024	Correspondence to Trustee's Office enc. NRW check; emails related to same.	KAH	0.20	60.00
10/16/2024	Attention to returned notices and rejections by registered agents of MT Abandon; prepare spreadsheet indicating same.	KAH	0.70	210.00
10/16/2024	communication with M. Bishop re his clients' objections to the Abandonment Motion (.4); revisions to proposed order to Abandonment Motion and related communications with H. James (.8); draft/revise report to Trustee on status our attempted resolutions of the formal and informal objections to the Abandonment Motion and related communications with M. Warner (1.3); multiple communications with M. Bishop and Chambers re Motion for Authority (.5); review of, and comments and revisions to, proposed oil and gas interests for amended Exhibit 1 to Proposed Order to Abandonment Motion (1.5).	PDS	4.50	2,700.00
10/16/2024	Review and analyze NRW's second motion to amend sale order approving sale agreement, other relevant pleadings and facts and law, draft opposition.	JDC	6.70	3,350.00
10/16/2024	Communication with R. Dykes re: relinquishment/abandonment	BWA	0.20	100.00
10/16/2024	Emails with B. Cueria re: Mitchell stip status	BAB	0.20	120.00
10/16/2024	Continued Drafting Memo re Mutual Mistake research	AWM	7.80	1,560.00
10/16/2024	Updating and correcting Exhibit Leases, ROWs and ROEs spreadsheet (2.2); Pulling schedules for Brooke relating to the spreadsheet (1.2)	AWM	3.40	680.00
10/16/2024	Review Venice Energy request and proposal (.4); conference call with counsel for same (.3); review access agreement and respond to W&T counsel regarding subsidiary issues (.5); additional analysis from Mr. Dykes regarding Talos issues (.6); multiple emails from Mr. Dykes regarding additional property / lease issues (.6); review and analyze additional Erath issues (.7); analysis regarding additional abandonment issues (1.0)	WSR	4.10	2,460.00
10/16/2024	Receive/review Data Cetner proposal from DartPoints (.4); analysis of additional storage issues (.8)	WSR	1.20	720.00
10/16/2024	Prepare amended exhibit to abandonment motion, communication with R. Dykes re: same (4.80); Attention to service of abandonment motion (.10)	BWA	4.90	2,450.00
10/16/2024	Attention to payment of payable (.40); Attention to quote from Dartpoints for records motion (.20)	BWA	0.60	300.00
10/17/2024	review of, and comments and revisions to, associate's memo re mutual mistake and waiver re NRW Second Motion to Amend and related communications with J. Cangelosi and A. Mock re opposition (1.4); communication with M. Dendinger, W. Robbins, and M. Warner re requested language for Abandonment Motion (.3); communication with chambers and M. Bishop re hearing on Motion for Authority (.3); review of, and comments and revisions to, revised oil and gas properties on amended exhibit and related communications with B. Altazan (1.3).	PDS	3.30	1,980.00
10/17/2024	emails regarding Talos setoff issues	WSR	0.40	240.00

10/17/2024	Review and analyze NRW's second motion to amend sale order approving sale agreement, other relevant pleadings and facts and law, draft opposition and stipulation.	JDC	8.60	4,300.00
10/17/2024	Analyze issues with oil inventory remaining in tanks	BAB	0.60	360.00
10/17/2024	Continued memo re mutual mistake research; sent to Jamie and Doug for review	AWM	0.70	140.00
10/17/2024	Continued updating memo re Erath Inventory; sent to Will for review	AWM	3.30	660.00
10/17/2024	Reviewing schedules for the Exhibit Leases, ROWs and ROEs spreadsheet	AWM	0.50	100.00
10/17/2024	Review and revise W&T GI 18 PSA and Assignment and analysis of subsidiary issues (1.8); tc with Trustee regarding same (.3); review and analyze pipeline 18141 proposal from W&T and investigate subsidiary / ownership issues (1.0); review and analyze other offer on various property, including Grand isle immovable property and EB871 (.4); analysis of remaining pipeline / storage issues and tc with Mr. Dykes regarding same (.8); analysis as to remaining abandonment exhibit issues (2.1)	WSR	6.40	3,840.00
10/17/2024	Finalize amended exhibit to abandonment motion and related notice	BWA	4.70	2,350.00
10/17/2024	Communication with R. Dykes re: oil inventory	BWA	0.20	100.00
10/17/2024	Attention to non-debtor subsidiary issues (.30); Correspondence from Exxon counsel re: NDA (.10)	BWA	0.40	200.00
10/17/2024	Review and compare latest draft of stipulation from Cueria office, again revise and reject changes, email to B. Cueria re: same and need to set motion for hearing	BAB	0.60	360.00
10/18/2024	Review and analyze NRW's second motion to amend sale order approving sale agreement, other relevant pleadings and facts and law, draft opposition.	JDC	5.30	2,650.00
10/18/2024	Correspondence from potential purchaser re: status (.10); Communication with feds re: NRW's regulatory compliance (.10)	BWA	0.20	100.00
10/18/2024	Emails with B. Cueria re: stip status	BAB	0.20	120.00
10/18/2024	Analyze list of issues from DOI re: NRW compliance, analyze avenues for resolving same	BAB	0.70	420.00
10/18/2024	communication with M. Dendinger re ONRR appeals (.3); communication with M. Rubenstein re Eni transaction (.1); communication with R. Kuebel re NRW and abandonment issues (.9); multiple communications with Interior re NRW and Abandonment issues (.3); multiple reviews of, and comments and revisions to, latest draft of NRW opposition and related communications with J. Cangelosi and A. Mock (2.3); multiple communications with chambers and M. Bishop re Motion for Authority re NDS (.8).	PDS	4.70	2,820.00



10/18/2024	review EW871 issues and voicemail to purchaser and email to Trustee regarding same (.8); email from Mr. Rubenstein regarding SPWD Gathering pipeline (.3); emails regarding Veritrust issues (.3); emails to/from Aaron Power regarding NDA and access to physical and electronic records (.5); emails from DOJ regarding NRW issues (.3); emails regarding Motion for Authority and regarding appeal issues in abandonment (.3); review and analyze various subsidiary organizational and other documents (2.6)	WSR	5.10	3,060.00
10/18/2024	Communication with counsel for ConocoPhillips and Exxon re: NDA and requested documents	BWA	0.40	200.00
10/21/2024	Receipt of R. Dykes activity report; update payables spreadsheet.	KAH	0.10	30.00
10/21/2024	Draft skeleton objection to Talos MT Lift Stay	KAH	0.40	120.00
10/21/2024	Additional research/pulling corporate docs from non debtor entities	KAH	0.60	180.00
10/21/2024	Researching information related to non-debtor subsidiary corporate status; running searches; ordering formation docs	KAH	0.90	270.00
10/21/2024	review of, and comments and revisions to, Trustee's revision of opposition to NRW motion and related communications with M. Warner, J. Cangelosi, and A. Mock (1.7); multiple communications with M. Bishop re NRW opposition and MF Authority (.6); Zoom with J. Cangelosi and M. Warner re opposition to NRW Second Motion to Amend and additional language for abandonment order (1.0); call with J. Bailey re MF Authority and Energy XXI Services questions (.5); multiple communications with M. Crocker re additional language for abandonment order proposed by Energy Transfer and related communications with M. Warner and W. Robbins (.7); communication with E. English, W. Robbins and L. Phillips re Talos stay relief continuance (.1); review of, and comments and revisions to, latest changes to NRW opposition and multiple related communications with M. Warner and J. Cangelosi (2.2); communication with M. Bishop re resolution of GOM Shelf's issues with MF Authority (.3), receipt and review of GOM Shelf limited opposition to NRW MT Amend (.4); communication with M. Crocker re settlement language (.2).	PDS	7.70	4,620.00
10/21/2024	Analyze issues with proposed revisions to order granting motion to abandon, propose alternative language	BAB	0.70	420.00
10/21/2024	Review limited objection to NRW motion to amend sale order	BAB	0.30	180.00
10/21/2024	Finalize Objection to MT Amend Sale Order	KAH	0.20	60.00
10/21/2024	receive/review DIP Lener Talos analysis; drafting objection to Talos motion; emails regarding continuance and settlement	WSR	1.00	600.00
10/21/2024	Telephone conference with Mr. Dykes regarding Erath and other issues (.3); review and analyze additional corporate structure and management of nondebtor affiliates (5.6); emails from various objecting parties and analysis regarding abandonment order and modified language (.5).	WSR	6.40	3,840.00

10/21/2024	Communication with Veritrust and analysis of access issues (.90); Attention to non-debtor subsidiaries' organization (.50)		BWA	1.40	700.00
10/21/2024	Draft opposition to NRW motion, prepare for filing.		JDC	8.70	4,350.00
10/21/2024	Attention to Hidden Access employment		BWA	0.20	100.00
10/22/2024	communication with M. Crocker and M. Warner re settlement language for abandonment motion (.4); communication with M. Warner re upcoming hearing on corporate authority (.4); communication with M. Crocker re abandonment language for order (.4); multiple communications with W. Robbins and B. Altazan re records motion (.4); communication with A. Carr re Veritrust invoice (.1); review of, and comments and revisions to, proposed order resolving objection to abandonment motion and related communications with M. Warner and M. Bishop (1.4); Zoom call with Interior re NRW certification and royalties, abandonment motion, and other issues and report on same to Trustee (1.8);		PDS	4.90	2,940.00
10/22/2024	draft and revise witness and exhibit list for hearing on motion for authority to exercise control over non-debtor subsidiaries	DR	NJS	1.10	440.00
10/22/2024	Review filed opposition, compile evidence.		JDC	0.50	250.00
10/22/2024	Attention to Hidden Assets employment		BWA	0.10	50.00
10/22/2024	Prepare for meeting with client and M. Borror re: 401k winddown issues, review of DOL guidance documents on plan expenses (0.5); emails with client re: rescheduling same (0.1)		BAB	0.60	360.00
10/22/2024	Analyze proposed revisions to abandonment order, revise same, multiple emails with client re: same		BAB	0.60	360.00
10/22/2024	Emails with client re: new case dealing with apportionment of expenses when dealing with non-estate property, review new cases		BAB	0.70	420.00
10/22/2024	Review memo on subsidiary structure, analyze issues relating to sale of property held by subs, approvals needed		BAB	0.90	540.00
10/22/2024	Attention to NDA's and doc request from predecessors; tracking of same.		KAH	0.60	180.00
10/22/2024	communication with M. Warner, B. Brown, and A. Mock re trustee compensation issue as relates to pension fund.		PDS	0.50	300.00
10/22/2024	Conducting research on Trustee's compensation for winding down Debtors retirement/pension plans		AWM	0.90	180.00
10/22/2024	emails to/from Veritrust, and to/from PXP counsel (.4); review and analyze NOV XL / W&T inventory issues and W&T PSA (1.0); review and analyze Records motion (.6); additional review and analysis of subsidiary issues (1.2)		WSR	3.20	1,920.00
10/22/2024	Communication with Veritrust re: NDAs and access to documents, analysis of same (2.50); Revise records motion (2.90); Attention to payables and timing (.20); Receipt of non-debtor subsidiary report (.10)		BWA	5.70	2,850.00
10/23/2024	Finalize Notice of Amended Proposed Order.		KAH	0.20	60.00



10/23/2024	multiple communications with M. Dendinger, M. Bishop and/or J. Bailey re settlement language for order on MF Authority (3.4); communication with A. Lowe re multiple litigation matters that her firm is handling (.2); draft/revise notice of revised order and related communications with Chambers, M. Warner, M. Bishop and J. Bailey (1.3); Zoom call with Fishman Haygood and M. Warner re litigation issues and Hedron mediation, follow up call communications with R. Dykes and M. Warner (1.7); communication with M. Warner re call with Interior (.3); communication with R. lamb re abandonment motion (.1).	PDS	7.00	4,200.00
10/23/2024	Attention to witness/exhibit list re MF Authority	KAH	0.20	60.00
10/23/2024	Continued research on Trustee's compensation for winding down Debtors retirement/pension plans	AWM	3.30	660.00
10/23/2024	communications to/from proposed purchaser counsel regarding GI Camp (.3); email to/from Trustee regarding EW871 (.4); email to/from trustee regarding GI 18 purchase documents (.4); emails and review of documents regarding piping / NOV XL inventory (.7); emails regarding Hedron (.3); review/revise purchase documents (1.0)	WSR	3.10	1,860.00
10/23/2024	email to/from Mr. Phillips regarding Talos setoff additional information;	WSR	0.30	180.00
10/23/2024	Attention to litigation document requests	BWA	0.40	200.00
10/23/2024	Receipt and review of OG motion to authorize trustee to exercise corporate authority over non-debtor subs	BAB	0.20	120.00
10/24/2024	Diligence regarding Energy XXI Onshore LLC, including its corporate structure, property, debts, and specific properties to be sold and related communications with W. Robbins, M. Schmidt, R. Kuebel, and M. Warner (6.1); communication with M. Warner and E. Ripley re abandonment motion (.1).	PDS	6.20	3,720.00
10/24/2024	Emails with client and M. Borrer re: conference call issues	BAB	0.20	120.00
10/24/2024	review and analyze various subsidiary transactions (1.2); emails to/from Mr. Dykes regarding Talos issues and JOA's (.3); review records for Talos issues (.6); review of Energy XXI Onshore corporate documents (1.0); emails to/from Trustee and revising GI 18 APA (1.2); emails and tc with Mr. Lackey regarding GI 18 and other issues (.3); analysis of additional NOV XL inventory issues (.4); inquiry as to Closing Escrow / W&T Agreement (.3)	WSR	5.30	3,180.00
10/24/2024	Review filed opposition to NRW motion	JDC	0.30	150.00
10/24/2024	Continued research on Trustee's compensation for winding down Debtors retirement/pension plans	AWM	3.00	600.00
10/24/2024	Began drafting research memo on Trustee's compensation for winding down Debtors retirement/pension plans	AWM	4.90	980.00
10/24/2024	Attention to records motion drafting	BWA	0.10	50.00
10/25/2024	Multiple communications with R. Anderson and M. Warner re tax returns and prompt determination letter.	PDS	0.20	120.00
10/25/2024	review JOA issues and communications requested by DIP Counsel for Talos	WSR	0.60	360.00

10/25/2024	emails regarding purchase issues	WSR	0.30	180.00
10/25/2024	communication with E. Ripley re abandonment motion (.4); communication with M. Warner re abandonment and potential sales at Debtor and NDS level (.8); review of, and comments and revisions to, abandonment motion and order (1.8); continued diligence on E XXI Onshore and particular properties (2.2); communication with B. Altazan and M. Warner re records motion (.2).	PDS	5.40	3,240.00
10/25/2024	Continued drafting research memo on Trustee's compensation for winding down Debtors retirement/pension plans	AWM	5.60	1,120.00
10/25/2024	Communication with Trustee re: records motion and analysis of same	BWA	0.40	200.00
10/28/2024	Attention to payables; update spreadsheet.	KAH	0.20	60.00
10/28/2024	communication with M. Warner and B. Brown re Kitchens admin claim opposition.	PDS	0.20	120.00
10/28/2024	communication with L. Phillips and E. English re Talos MLS.	PDS	0.10	60.00
10/28/2024	continued due diligence re Grand Isle property owned by E. XXI Onshore and multiple related communications with W. Robbins and B. Box.	PDS	2.30	1,380.00
10/28/2024	Draft/revise amended motion to abandon, reject, and compromise, amended proposed order and exhibits, and related communications with Interior, M. Dendinger, and M. Warner.	PDS	3.10	1,860.00
10/28/2024	Attention to Hidden Assets employment status (.10); Communication with SPC re: employment of non-testifying expert (.20)	BWA	0.30	150.00
10/28/2024	email and Telephone conference with Mr. Wyatt regarding SPWD pipeline sale issues (.3); Review Energy XXI / APort PSA (.5)	WSR	0.80	480.00
10/28/2024	review JOA's requested by counsel DIP Lender; emails to/from counsel for DIP Lender and others regarding same	WSR	1.20	720.00
10/28/2024	additional review and emails regarding Talos JOA's requested by DIP Lender counsel	WSR	0.40	240.00
10/28/2024	Preparing documents to share re TALOS Requested JOA's	KAH	0.40	120.00
10/28/2024	Additional review and analysis of Grand Isle property / Energy XXI Onshore issues	WSR	0.50	300.00
10/28/2024	Conducted more research and continued drafting research memo on Trustee's compensation for winding down Debtors retirement/pension plans	AWM	8.80	1,760.00
10/28/2024	Continue editing, analyzing records motion and related issues	BWA	2.00	1,000.00
10/29/2024	Attention to returned notices re mt abandon	KAH	0.20	60.00
10/29/2024	Preparation of operating projections for Trustee.	PDS	1.70	1,020.00

10/29/2024	communication with Interior re abandonment motion (.1); communication with W. Robbins re multiple potential transactions (.5); communication with L. Phillips re stipulation and other issues (.3); review of communication from S. Soule re facility at VESCO and oil remaining onsite and related communications with W. Robbins (.5).		PDS	1.40	840.00
10/29/2024	Application to employ non-testifying expert		BWA	3.00	1,500.00
10/29/2024	Attention to potential equipment sale (.50); Attention to GI 18 Purchase Agreement proposed redlines (.10)		BWA	0.60	300.00
10/29/2024	Emails with B. Cueria re: status of stipulation on MRS		BAB	0.20	120.00
10/29/2024	Review and analyze DOL guidance, recent cases dealing with bankruptcy court authority over 401k plans, analyze same (1.1); prepare for and participate in telephone conference with client, M. Borrer re: plan termination issues, apportionment of costs of termination (1.0)		BAB	2.10	1,260.00
10/29/2024	prepare for and meeting with A-Port and R. Kuebel re potential purchase of Energy XXI Onshore assets (.9); communication with B. Box re value of real properties in Grand Isle (.3).		PDS	1.20	720.00
10/29/2024	review and analysis of Records Motion and Telephone conference with Trustee regarding same		WSR	0.60	360.00
10/29/2024	Telephone conference Trustee regarding GI 18 PSA and revisions to same (1.0); Telephone conference with APort and counsel regarding GI property purchase (.8); Telephone conference with Mr. Dykes regarding Oil inventory and GI property (.3); analysis of EPI oil inventory issues (.5); review Highlander proposal and follow up emails to/from counsel and others (.5); analysis of subsidiary and sale issues (1.2)		WSR	4.30	2,580.00
10/29/2024	Conducted more research and continued drafting research memo on Trustee's compensation for winding down Debtors retirement/pension plans		AWM	9.40	1,880.00
10/29/2024	Finalize draft records motion, communication with Trustee and N. Zimmerman re: same		BWA	5.70	2,850.00
10/30/2024	Emails from vendors checking status of payment; email to B. Dassa re: same.		KAH	0.20	60.00
10/30/2024	continue revising SRBA first interim application	DR	NJS	1.80	720.00

10/30/2024	receipt and preliminary review of NRW's Motion re Stipulation and to Expedite and related communications with Chambers, A. Mendez, J. Cangelosi, A. Mock, and M. Warner re motion and hearing (2.8); communication with L. Phillips and M. Warner re proposed stipulation with Lenders (.7); communication with R. Lamb re Interior issues with Motion to Abandon (.2); communication with L. Phillips and W. Robbins re settlement with lien claimants (.5); communication with W. Robbins re VESCO issues and value of potential assets there (.2); review of, and comments and revisions to, draft opposition to NRW's motion for expedited relief and related communications with A. Mendez (.9); draft/revise notes re necessary short-term steps for litigation of NRW motions and related communications with J. Cangelosi, A. Mock, and K. Heard (1.5); review of, and comments and revisions to, proposed communication to A. Mendez re disputed oil and related communications with W. Robbins (.3).	PDS	7.10	4,260.00
10/30/2024	Review NRW motion expedite hearing, review correspondence with A. Mendez, Trustee, and court, draft objection thereto and proposed order.	JDC	2.80	1,400.00
10/30/2024	Review proposed redlines to W&T, GI 18 purchase agreement, redline same (.60); Analysis of abandonment (.30); Analysis of equipment scrap value (.10)	BWA	1.00	500.00
10/30/2024	Attention to potential clawback issues	BWA	0.30	150.00
10/30/2024	Emails with client, M. Borrer re: plan distributions since trustee appointment	BAB	0.20	120.00
10/30/2024	Emails and telephone conference with D. Landwehr re: Mitchell stay relief stipulation, analyze proposed change, email to client re: same	BAB	0.70	420.00
10/30/2024	Emails with client re: recent bankruptcy cases on 401k plan termination issues, review same	BAB	0.80	480.00
10/30/2024	Emails with M. Borrer re: schedule of 401k plan distributions, review and analyze same	BAB	0.60	360.00
10/30/2024	Emails with client re: Mitchell stay stip and proposed change re: discovery obligations	BAB	0.30	180.00
10/30/2024	Review and analyze memo re: 401k plan cost allocation and bankruptcy court involvement in same	BAB	0.70	420.00
10/30/2024	multiple communications with C. Sonnier re casualty case she is defending on behalf of Cox's carrier and related communications with W. Robbins and B. Altazan.	PDS	0.50	300.00
10/30/2024	Email From DIP counsel regarding Talos setoff	WSR	0.30	180.00
10/30/2024	Analysis of DIP Carveout issues (.4); review and draft asset sale list (1.0); review and analyze Trade Vendor Order, Motion and Agreements as to lien ranking issues as to preference and proposed settlement (1.2)	WSR	2.60	1,560.00
10/30/2024	Revising GI 18 purchase agreement (.8); email forwarding same (.3); analysis of VESCO issues and abandonment proposal (1.2); email to VESCO counsel (.2); analysis of Erath inventory issues (1.3); email to NRW counsel regarding ownership and proposed sale (1.2)	WSR	5.00	3,000.00

10/30/2024	Finalized research memo on Trustee's compensation for winding down Debtors retirement/pension plans		AWM	5.00	1,000.00
10/30/2024	research re NRW motion		AWM	0.30	60.00
10/30/2024	Revise records motion based on Trustee's redlines/issues raised, communication with N. Zimmerman re: same (3.60); Attention to HR files (.90); Attention to payables status and communication with Veritrust re: same (.6); Attention to litigation document requests (.10)		BWA	5.20	2,600.00
10/31/2024	multiple communications with M. Warner, B. Barriere and T. Howley re D&O Coverage issues.		PDS	0.60	360.00
10/31/2024	communication with J. Cangelosi, A. Mock and K. Heard re NRW discovery issues (.5); multiple communications with W. Robbins, B. Box and M. Warner re Grand Isle property (.4); communication with N. Zimmerman and A. Potter re accounting info request on E XXI Onshore (.2); communication with B. Kadden re meeting with his client re NRW Motions (.2); communication with Interior re meeting with them on NRW Motions (.1); attention to NRW Motions and necessary discovery for upcoming hearings and related communications with J. Cangelosi and A. Mock (3.3); communication with W. Robbins and L. Phillips re carveout issues (.3).		PDS	5.00	3,000.00
10/31/2024	multiple communications with L. Phillips, E. English and W. Robbins re Talos settlement.		PDS	0.20	120.00
10/31/2024	Attention to Blue Camp Grand Isle abstract		KAH	0.20	60.00
10/31/2024	Draft discovery requests relative to NRW's motions.		JDC	7.00	3,500.00
10/31/2024	continue drafting/revising SRBA first interim fee application	DR	NJS	2.50	1,000.00
10/31/2024	follow up email to K. Elmer (Fishman Haygood) re engagement agreement for Kushner Lagraize	A108	NJS	0.10	40.00
10/31/2024	Research ability to have application to employ expert heard on ex-parte basis	A102	NJS	0.50	200.00
10/31/2024	attention to matters concerning special counsel's employment of expert	A111	NJS	0.40	160.00
10/31/2024	phone call with K. Elmer (Fishman Haygood) re engagement of experts and application issues	A108	NJS	0.20	80.00
10/31/2024	email to D. Finegan (KL) re conflicts check for employment	A108	NJS	0.30	120.00
10/31/2024	draft and revise TPS west first interim application	DR	NJS	1.20	480.00
10/31/2024	Draft application to employ non-testifying expert, communication with SPC and proposed expert re: same		BWA	3.90	1,950.00
10/31/2024	Telephone conference with D. Landwehr re: stay relief stipulation and changes to same		BAB	0.40	240.00
10/31/2024	Analysis of recent case dealing with cost allocation in 401k plan termination during bankruptcy		BAB	0.70	420.00
10/31/2024	Draft subpoenas for third party witnesses.		KAH	0.30	90.00
10/31/2024	Run searches for whereabouts of fact witness.		KAH	0.50	150.00
10/31/2024	Continued researching NRW issues for response		AWM	5.30	1,060.00

10/31/2024	Drafting discovery request re NRW Stipulation Motion	AWM	1.10	220.00
10/31/2024	Attention to records motion edits	BWA	0.30	150.00
Total			521.30	\$243,280.00

FEE EARNER SUMMARY

Fee Earner		Hours	Effective Rate	Amount
PDS	Paul Douglas Stewart, Jr.	106.20	600.00	63,720.00
WSR	William S. Robbins	94.70	600.00	56,820.00
AWM	Abigail W. Mock	122.60	200.00	24,520.00
BAB	Brandon A. Brown	34.90	600.00	20,940.00
BWA	Brooke W. Altazan	77.40	500.00	38,700.00
JDC	Jamie D. Cangelosi	57.80	500.00	28,900.00
KAH	Kimberly A. Heard	14.00	300.00	4,200.00
NJS	Nicholas J. Smeltz	13.70	400.00	5,480.00

TASK SUMMARY

Task		Hours	Effective Rate	Amount
B110	Case Administration	2.80	521.43	1,460.00
B120	Asset Analysis and Recovery	21.20	540.57	11,460.00
B130	Asset Disposition	364.80	497.20	181,380.00
B140	Relief from Stay/Adequate Protection Proceedings	11.30	578.76	6,540.00
B160	Fee/Employment Applications	22.60	442.04	9,990.00
B180	Avoidance Action Analysis	0.30	500.00	150.00
B190	Other Contested Matters(excluding assumptions/reje	5.20	465.38	2,420.00
B210	Business Operations	3.40	370.59	1,260.00
B220	Employee Benefits/Pensions	51.10	279.84	14,300.00
B240	Tax Issues	0.20	600.00	120.00
B310	Claims Administration and Objections	38.30	370.23	14,180.00
BW	Billable Work	0.10	200.00	20.00

DISBURSEMENTS

Date	Description	Amount
5/8/2024	Credit for duplicate charge for Service by BK ATTORNEY SERVICES, LLC d/b/a CertificateofService.com	-184.52
7/12/2024	PC Connection for software	109.68
8/14/2024	PC Connection for software	109.68
9/13/2024	PC Connection for software	109.68
10/3/2024	Ordering corporate documents	30.00
10/3/2024	Ordering corporate documents	30.00
10/3/2024	TransUnion for UCC searches	359.00
10/3/2024	Ordering corporate documents	38.00
10/3/2024	Ordering corporate documents	40.00
10/3/2024	Ordering corporate documents	44.00
10/3/2024	Ordering corporate documents	34.00
10/3/2024	Ordering corporate documents	34.00
10/3/2024	Ordering corporate documents	34.00
10/3/2024	Ordering corporate documents	32.00
10/4/2024	Texas Secretary of State database fees for entity inquiries	1.00



10/9/2024	FedEx from Division of Corporations, Dover, DE	86.26
10/12/2024	PC Connection for software	109.68
10/21/2024	Louisiana Secretary of State to obtain certified copies of documents of Energy XXI Onshore, LLC	30.00
10/21/2024	Louisiana Secretary of State to obtain certified copies of documents of Cox Gathering LLC	30.00
10/22/2024	Texas Secretary of State database fees for entity inquiries.	1.00
10/31/2024	Copies for October 2024	134.60
10/31/2024	Pacer for October 2024	85.10
Total DISBURSEMENTS		\$1,297.16

PAYMENTS		
Date	Description	Amount
11/4/2024		140,171.49
Total PAYMENTS		\$140,171.49

New Charges	\$244,577.16
Previous Balance	\$605,058.18
Payments	-\$140,171.49
Balance Forward	\$464,886.69
Balance Due	\$709,463.85

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:****MLCJR LLC, *et al.*,<sup>1</sup>****Debtors**

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**Chapter 7****Case No. 23-90324 (CML)****Jointly Administered**


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**SEVENTH MONTHLY STATEMENT OF SERVICES RENDERED AND EXPENSES  
INCURRED FOR THE PERIOD ENDING NOVEMBER 30, 2024 BY STEWART  
ROBBINS BROWN & ALTAZAN, LLC AS COUNSEL TO THE TRUSTEE**

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Stewart Robbins Brown & Altazan LLC (“SRBA”), proposed counsel for Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”) for the above-captioned administratively consolidated estates (collectively, the “Estates”), hereby submits this Seventh Monthly Fee Statement for Services Rendered and Expenses Incurred (the “Monthly Fee Statement”) for the period ending November 30, 2024 (the “Statement Period”), in accordance with the Court’s *Order Granting Trustee’s Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee’s Professionals* [Docket # 1831] establishing interim compensation procedures (the “Interim Compensation Order”). In support of the Monthly Fee Statement, SRBA respectfully represents as follows:

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.



SRBA respectfully submits this Monthly Fee Statement seeking compensation for reasonable, actual and necessary services and expenses rendered by SRBA on behalf of the Trustee during the Statement Period:

STATEMENT PERIOD SUMMARY	
Name of Applicant:	Stewart Robbins Brown & Altazan LLC
Applicant's Role in Case:	Chapter 7 Trustee's General Counsel
Date of Retention:	June 12, 2024 (Doc. 2116) retroactive to May 6, 2024
Period Covered by this Statement:	Nov 1, 2024 through Nov 30, 2024
Number Monthly Fee Statements:	Seventh
STATEMENT PERIOD SUMMARY OF FEES AND EXPENSES	
Total Statement Period Fees	\$204,200.00
Total Interim Fees (80%) Requested	\$163,360.00
Total Expenses Requested	\$7,895.05
Total Interim Remuneration Requested (exclusive of holdback):	\$171,255.05
STATEMENT PERIOD SUMMARY FOR ATTORNEYS	
Total attorney fees requested in this statement:	\$197,840.00
Total actual attorney hours covered by this statement:	444.30
Average hourly rate for attorneys:	\$485.71
STATEMENT PERIOD SUMMARY FOR PARAPROFESSIONALS	
Total paraprofessional fees requested in this statement:	\$6,360.00
Total actual paraprofessional hours covered by this statement:	21.2
Average hourly rate for paraprofessionals:	\$300.00

**In accordance with the *Order Granting Trustee's Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee's Professionals* [Docket no. 1831], each party receiving notice of the monthly fee statement will have until 5:00 p.m. (Prevailing Central Time), 10 days after the filing of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 10-day period, the Trustee is authorized to pay the professional the amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

1. The following chart presents certain information regarding the SRBA professionals whose work on these chapter 7 cases compensation is sought in this Monthly Fee Statement sorted by professional, along with each professionals' title, earliest bar passage (if applicable), highest rate, blended rate, total amount billed, and percentage of billings:

Professional	Title	Date Initial Bar License	Total Time	Blended Rate	Highest Rate	Total Amount Billed	Percentage Billed
<u>Brandon A. Brown</u>	Member	LA - 1998	5.80	\$600.00	\$600.00	\$3,480.00	1.70%
<u>Brooke W. Altazan</u>	Member	LA - 2009	33.40	\$500.00	\$500.00	\$16,700.00	8.18%
<u>Kimberly A. Heard</u>	Paralegal	N/A	21.20	\$300.00	\$300.00	\$6,360.00	3.11%
<u>Nicholas J. Smeltz</u>	Associate	LA - 2019	51.00	\$400.00	\$400.00	\$20,400.00	9.99%
<u>Paul D. Stewart, Jr.</u>	Member	LA - 1996	57.00	\$600.00	\$600.00	\$34,200.00	16.75%
<u>William S. Robbins</u>	Member	LA - 1996	79.30	\$600.00	\$600.00	\$47,580.00	23.30%
<u>Abigail W. Mock</u>	Associate	LA - 2024	111.40	\$200.00	\$200.00	\$22,280.00	10.91%
<u>Jamie D. Cangelosi</u>	Of Counsel	LA - 2000	106.40	\$500.00	\$500.00	\$53,200.00	26.05%
<b>Grand Total</b>			<b>465.50</b>	<b>\$400.00</b>	<b>\$600.00</b>	<b>\$204,200.00</b>	<b>100.00%</b>

2. The following chart provides a summary of fees incurred during the Statement Period sorted by ABA bankruptcy task code, along with the total time, percentage of time, total billed amount, and percentage of amount for each task:

Task	Total Time	Percent of Time	Total Amount	Percent of Amount
b110 Case Administration	1.2	0.26%	\$600.00	0.29%
b120 Asset Analysis and Recovery	11.8	2.53%	\$6,990.00	3.42%
b130 Asset Disposition	376	80.77%	\$169,670.00	83.09%
b140 Relief from Stay/Adequate Protection	0.2	0.04%	\$100.00	0.05%
b150 Communications with Creditors	0.3	0.06%	\$180.00	0.09%
b160 Fee/Employment Applications	40.1	8.61%	\$16,720.00	8.19%
b190 Other Contested Matters	18.8	4.04%	\$4,150.00	2.03%
b210 Business Operations	2.2	0.47%	\$660.00	0.32%
b220 Employee Benefits/Pensions	11.4	2.45%	\$3,920.00	1.92%
b310 Claims Administration and Objections	2	0.43%	\$400.00	0.20%
b240 Tax Issues	0.8	0.17%	\$390.00	0.19%
b320 Plan and Disclosure Statement	0.7	0.15%	\$420.00	0.21%
<b>Grand Total</b>	<b>465.5</b>	<b>100.00%</b>	<b>\$204,200.00</b>	<b>100.00%</b>

3. The following chart provides a summary of expenses incurred during the Statement Period sorted by category of expenses:

SUMMARY OF EXPENSES	
Expense Description	Expenses Amount
Copies	\$356.00
Service of Pleadings	\$6,771.65
Corporate Records	\$742.90
Tax Records	\$4.00
Certified Records	\$20.50
<b>Grand Total</b>	<b>\$7,895.05</b>

4. SRBA's invoice covering the Statement Period and providing a detailed statement of both (a) hours spent rendering legal services to the Trustee and (b) disbursements made or incurred by SRBA in connection with services performed on behalf of the Trustee during the Statement Period is attached hereto as **Exhibit "A"**.

5. Pursuant to the Interim Compensation Order, SRBA seeks payment of \$171,255.05 from the Trustee for the Statement Period, representing (a) 80% of SRBA's total fees for services rendered and (b) 100% of the total expenses incurred during the Statement Period.

6. Although every effort has been made to include all fees and expenses incurred during the Statement Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Statement Period. SRBA reserves the right to seek allowance of such fees and expenses not included herein.

Dated: February 4, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN  
& ALTAZAN, LLC**

By: /s/Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
William S. Robbins (Tx. Bar # 24100894)  
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Brandon A. Brown (Tx. Bar # 24104237)  
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301 Main Street, Suite 1640  
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***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**MLCJR LLC, *et al.***  
**EXHIBIT A**

**DETAILED TIME AND EXPENSE ENTRIES**  
**Time Period – November 1, 2024 – November 30, 2024**



301 Main Street, Suite 1640  
Baton Rouge, LA 70821  
225-231-9998

Michael D. Warner  
440 Louisiana Ave., Suite 900  
Houston, TX 77002  
USA

January 30, 2025

File #: 119-001  
Invoice #: 1536

RE: In re MLCJR LLC & M21K, LLC

DATE	DESCRIPTION	Task	LAWYER	HOURS	AMOUNT
11/1/2024	Attention to payables; update spreadsheet; emails related to same.	B210	KAH	0.20	60.00
11/1/2024	communication with R. Dykes and Interior re decommissioning order for ROW OCS-G29265 and OCS-G29407 (.1); communication with B. Barrier and T. Howley re upcoming coverage discussion (.1); review of, and comments and revisions to, written discovery to NRW re Motion to Amend and Motion re Stipulation and related communications with J. Cangelosi and A. Mock (2.6); communication with A. Mendez re setting of hearing on NRW Motions and settlement possibilities (.4); review of, and comments and revisions to, two sets of written discovery to NRW and related communications with J. Cangelosi (1.5); communication with M. Warner re NRW litigation (.2).	B130	PDS	4.90	2,940.00
11/1/2024	communication with R. Dykes re document requests for defense attorneys.	B190	PDS	0.10	60.00
11/1/2024	continue drafting/revising TPS West first interim fee application	B160	NJS	1.70	680.00
11/1/2024	Review SPWD receivable issue and correspondence (.4); additional communications regarding SPWD pipeline receivable; email to/from Mr. Lackey regarding GI 18 (.5)	B120	WSR	0.90	540.00
11/1/2024	Draft and serve discovery requests, draft subpoenas and notices relative to NRW's motions.	B130	JDC	6.00	3,000.00
11/1/2024	Revise records motion, communication with Trustee and special purpose counsel re: same (3.40); Attention to equipment destruction notice (.10)	B130	BWA	3.50	1,750.00
11/1/2024	Download/assemble abstract parts and surveys for Grand Isle camp	B130	KAH	0.30	90.00
11/1/2024	Continued drafting discovery request to NRW re Stipulation Motion.	B130	AWM	2.80	560.00
11/1/2024	Researching abandonment issues re NRW assets	B130	AWM	1.90	380.00
11/1/2024	Review/revise records motion	B130	WSR	0.80	480.00
11/1/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	BWA	0.40	200.00
11/1/2024	Attention to providing document access to counsel	B130	BWA	0.40	200.00

11/4/2024	Finalize October payables; email related to same.	B210	KAH	0.30	90.00
11/4/2024	continue drafting/revising SRBA first interim fee application	B160	NJS	2.40	960.00
11/4/2024	phone call with D. Powell (GPMBF) re GPMBF fees	B160	NJS	0.20	80.00
11/4/2024	continue drafting/revising TPS west first interim fee application	B160	NJS	1.70	680.00
11/4/2024	communication with J. Cangelosi and A. Mock re turnover request from Debtor's former professionals (.5); communication with T. Howley, Brent Barriere and others re Highlander insurance claim (.5) and B. Barriere re Ida claim (.3); communication with K. Hines re NRW issues (.4); communication with M. Warner re Talos hearing, dates of NRW hearings, Interior consent to abandonment, and final fee apps of record (.5); review of draft 30(b)(6) depositions and topics re NRW litigation (.6); communication with S. Galiana re Grand Isle property (.1);	B130	PDS	2.90	1,740.00
11/4/2024	Telephone calls and emails to Jefferson Parish Sheriff and Tax Assessor re: taxes due on offshore platform	B240	KAH	0.30	90.00
11/4/2024	Draft correspondence to Debtors' professionals seeking documents relative to NRW's motions, subpoenas and notices (2); draft 30(b)(6) notice of deposition of NRW (1).	B130	JDC	3.00	1,500.00
11/4/2024	Communication with Trustee re: records motion	B130	BWA	0.10	50.00
11/4/2024	Researching abandonment procedure; drafting notice of intent to abandon	B130	AWM	2.00	400.00
11/4/2024	Review records motion and additional analysis regarding same	B130	WSR	0.50	300.00
11/4/2024	VESCO review and analyze offer (.5); Review and analyze additional information on Tubular inventory / W&T issues; email to/from counsel; email and tc with Trustee regarding same; tc with counsel (1.5) Tc with W&T Counsel regarding GI 18; analysis of ad valorem tax issues (.5); Emails regarding Talos setoff issues (.4)	B130	WSR	2.90	1,740.00
11/4/2024	Attention to Veritrust issues (.20); Attention to October payables (.40)	B130	BWA	0.60	300.00
11/5/2024	communication with Fishman re OGYs access for TPS West (.1); multiple communications with N. Zimmerman and K. Heard re Mimecast access for firm (.6); communication with W. Robbins re sale procedures and strategy (.6); draft/revise communications to former professionals re turnover and forthcoming subpoenas and review and comment on subpoenas and associated RFP's and related communications with former professionals (1.3); revisions and comments to subpoena exhibit for NRW hearings (.8); communication with A. Mendez re hearing dates (.1); communication with L. Philips and R. James re bonds (.2); communication with L. Phillips re D&O Claims (.1); analysis of multiple claims re NRW to complete initial discovery requests (1.3).	B130	PDS	5.10	3,060.00
11/5/2024	continue drafting/revising SRBA first interim fee application	B160	NJS	1.30	520.00
11/5/2024	continue drafting/revising TPS West first interim fee application	B160	NJS	1.10	440.00

11/5/2024	Revise document requests, subpoenas to professionals (1); research and analyze response to NRW motion re: Stipulation, begin drafting response (3.7); participate in meetings with Interior, B. Kadden re: NRW (.4).	B130	JDC	5.10	2,550.00
11/5/2024	Attention to Trustee's edits to records motion, analysis of same (1.0); Communication with special purpose counsel re: records motion issues and meeting (.20)	B130	BWA	1.20	600.00
11/5/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	1.60	640.00
11/5/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	BWA	0.70	350.00
11/5/2024	Drafting Subpoenas for Moelis & Company, A&M, and Latham & Watkins; Drafting Notice of Subpoenas	B130	AWM	2.50	500.00
11/5/2024	Emails regarding Talos motion and issues (.3); email to/from Scott Williams regarding bond issue (.2); Follow up on Erath inventory issues (.2); review and analyze sale motion issues (.5); analysis of DIP carveout / stipulation issues (1.4); review and analyze VESCO oil / abandonment issues (.8); email to Mr. Wyatt regarding pipeline status (.2); analysis of GI 18 tax issues and sale motion issues (1.0)	B130	WSR	4.60	2,760.00
11/5/2024	Attention to October payables (.30); Attention to Veritrust records intentions (.20); Analysis of document access for Debtors' counsel (.10); Correspondence from counsel re: Argo bonds, analysis of same (.20)	B130	BWA	0.80	400.00
11/6/2024	Communications with (i) O. Watanabe (.3) and (ii) R. Omohundro (.4) re turnover of documents and evidence re NRW second motion to amend; communication with B. Kadden re discovery from Spectrum re NRW second motion to amend (.5); Zoom with J. Cangelosi, A. Mock and Interior team re NRW Motions and abandonment (.6) and related follow up with J. Cangelosi and A. Mock (.2); communication with W. Robbins and M. Warner re sales issues (.3); communication with L. Phillips re Lenders' proposed stipulation (.2); review and comments to proposed communications to third parties re discovery on NRW motions (.7); review of evidence re NRW Second Motion to Amend and Motion re Stipulation (1.5); communication with A. Mendez and W. Robbins re CEXXI LLC claims (.2); communication with B. Altazan and M. Warner re records motion (.3).	B130	PDS	5.20	3,120.00
11/6/2024	draft and revise trustee interim application	B160	NJS	0.80	320.00
11/6/2024	Draft and send request to B. Kadden re: Spectrum, NRW (.5); research and analyze response to NRW motion re: Stipulation, draft response (5).	B130	JDC	5.50	2,750.00
11/6/2024	Analysis of records motion issues, communication with special purpose counsel re: same	B130	BWA	0.60	300.00
11/6/2024	Zoom meeting with D. Stewart, J. Cangelosi, and Interior re NRW assets	B130	AWM	0.50	100.00
11/6/2024	Analysis of issues related to NRW matter.	B130	AWM	1.70	340.00
11/6/2024	Zoom meeting with D. Stewart, J. Cangelosi and Benjamin Kadden re stipulation motion	B130	AWM	0.50	100.00



11/6/2024	Zoom meeting with D. Stewart and J. Cangelosi re NRW's Stipulation Motion	B130	AWM	0.30	60.00
11/6/2024	tc and email regarding GI 18 tax issues (.3); analysis of subsidiary issues (.5); tc with counsel for VESCO regarding abandonment / sale issues (.3); follow up on Erath issues (.2); analysis of carveout / sale issues (.5); emails regarding USCG inquiry (.3)	B130	WSR	2.10	1,260.00
11/6/2024	Analysis of document access for Debtors' counsel	B130	BWA	0.40	200.00
11/6/2024	Reviewing TSA and PSA re royalties	B130	AWM	2.90	580.00
11/7/2024	communication with M. Bagot re Offshore oil services inc. claim issues.	B150	PDS	0.30	180.00
11/7/2024	Telephone call with tax assessor and sheriff/tax collector re: offshore platform taxes due.	B130	KAH	0.20	60.00
11/7/2024	emails from Mr. Dykes (.4); email to/from Veritrust and review NDA's (.5); email to counsel for EP Energy regarding records issues (.3)	B120	WSR	0.80	480.00
11/7/2024	Research and analyze response to NRW motion re: Stipulation, draft response.	B130	JDC	5.50	2,750.00
11/7/2024	communication with M. Warner and B. Barriere re Ida claim (.2); revisions to exhibit for subpoenas relating to NRW litigation (.5); attention to Cox email and document repositories re NRW Motion (.8); meeting with L. Philips re proposed lender stipulation (.8); analysis of NRW claims and related communications with A. Mock and J. Cangelosi (1.4); communication with A. Potter re Energy XXI Services tax returns and fixed asset schedule (.3).	B130	PDS	4.00	2,400.00
11/7/2024	Multiple emails with IT, outside counsel, and others related to document center access.	B130	KAH	0.50	150.00
11/7/2024	Analysis of facts underlying NRW motion	B130	AWM	3.20	640.00
11/7/2024	Compiling a list of search terms for Mimecast & NAS re NRW motion	B130	AWM	0.50	100.00
11/8/2024	tc with Barrier team regarding records issues (.4); emails to/from Mr. Dykes regarding various issues (.4); analysis of NRW regulatory compliance motion issues (1.0); review tubular inventory issues and follow up with W&T Counsel (.3); review Erath issues (.2); review and analyze sale / subsidiary issues (1.2)	B120	WSR	3.30	1,980.00
11/8/2024	Research and analyze response to NRW motion re: Stipulation, draft response.	B130	JDC	3.50	1,750.00
11/8/2024	Telephone conference with SPC re: records motion and tangential issues, analysis of same	B110	BWA	0.70	350.00
11/8/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	2.70	1,080.00
11/8/2024	Analysis of facts underlying NRW motion	B130	AWM	3.80	760.00
11/8/2024	Began drafting objection to NRW's Stipulation Motion	B130	AWM	1.20	240.00
11/11/2024	Attention to November payables	B210	KAH	0.30	90.00
11/11/2024	Email from REV re outstanding payment; prepare spreadsheet of REV invoices; multiple emails related to same.	B210	KAH	0.80	240.00

11/11/2024	Emails to/from C. Sonnier's Office and our IT re: document database access	B190	KAH	0.20	60.00
11/11/2024	Conference call with B. Barriere and M. Warner re upcoming Hedron mediation and Ida claim (.6); communication with L. Phillips re stipulation (); communication with A. Mock and J. Cangelosi re NRW matters (.4)	B130	PDS	0.60	360.00
11/11/2024	Meeting with R. Lamb with Interior, follow up re: same (1); research and analyze response to NRW motion re: Stipulation, draft response (5.5).	B130	JDC	6.50	3,250.00
11/11/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.90	360.00
11/11/2024	Continued drafting objection to NRW's Stipulation Motion	B130	AWM	6.90	1,380.00
11/11/2024	Formatting Word document for Trustee's response to NRW's discovery requests	B130	AWM	0.60	120.00
11/11/2024	Call with J. Cangelosi and Ryan Lamb re NRW's Stipulation Motion	B130	AWM	0.80	160.00
11/11/2024	Analysis of carveout issues (.5); Emails to/from Rev regarding outstanding balance and analysis and emails of invoices (.6); Review and analyze NRW PSA and other materials in prep for responsive pleadings and hearings (1.5)	B130	WSR	2.60	1,560.00
11/11/2024	Communication with REV re: internet service and analysis of issues presented (.90); Correspondence from counsel re: document production (.10); Communication with A. Carr re: Veritrust records (.10)	B130	BWA	1.10	550.00
11/12/2024	Receipt of DartPoints invoices from Trustee; review status of DartPoints; email to D. Stewart re: cancellation of DartPoints services.	B210	KAH	0.20	60.00
11/12/2024	Emails and telephone call with C. Sonnier's office re: access to documents	B190	KAH	0.30	90.00
11/12/2024	multiple communications with Interior re form of abandonment order (.2); communication with L. Phillips re stipulation with Lenders (.4); communication with M. Dendinger re form of abandonment order (.1); meeting with W. Robbins re NRW regulatory approval (.7); revisions to motion to abandon, reject, and compromise and related order and exhibits and circulation to Interior (.8).	B130	PDS	2.20	1,320.00
11/12/2024	Research and analyze response to NRW motion re: Stipulation, draft response.	B130	JDC	7.00	3,500.00
11/12/2024	Communication with Trustee and SPC re: records motion	B130	BWA	0.80	400.00
11/12/2024	Continued drafting objection to NRW's Stipulation Motion; sent to Jamie and Doug for review	B130	AWM	3.40	680.00
11/12/2024	Researching issues related to NRW stipulation	B130	AWM	3.50	700.00

11/12/2024	Emails to/from Lackey regarding GI 18 and regarding piping inventory; review revised PSA; email to Trustee (1.2); conference call with DIP Lender and Talos counsel regarding setoff issues (.4); emails regarding pipeline AR; (.3) analysis of VESCO oil purchase issues (.6); emails and analysis of NRW and ONRR issues (2.8); review PSA and Sale Order (.8)	B130	WSR	6.10	3,660.00
11/12/2024	Receipt and review of stipulation between DIP parties and other lien claimants	B240	BAB	0.50	300.00
11/12/2024	meeting with L. Philips and W. Robbins re Lender stipulation and NRW sale issues (2.1); communication with B. Barriere re Ida claims (.2); work with A. Mock and J. Cangelosi re NRW regulatory issues (.7); multiple communications with A. Lowe re Lazard and Lewis tort documentation (.2).	B130	PDS	3.20	1,920.00
11/13/2024	Attention to document download issues from documents copied from servers; emails related to same.	B130	KAH	0.30	90.00
11/13/2024	Providing Mimecast access to R. Dykes; emails related to same.	B190	KAH	0.20	60.00
11/13/2024	Setting up ShareFile and document request for Kean Miller; emails related to same.	B190	KAH	0.20	60.00
11/13/2024	Meeting with R. Dykes and litigation team re NRW motions and planned actions re royalties, proposed sales, and situation with Lenders (2.8); communication with B. Barriere (.3); M. Warner (.3); and L. Phillips (.1) re Lenders' stip, amended motion to abandon, and litigation; revisions to motion to abandon, reject, and compromise and related communications with R. Lamb and K. Hines at Interior and M. Warner (2.5); communication with Debtors' professionals re turnover and NRW issues (.1); revisions to subpoenas for same (.7); review of opposition to NRW motion re stipulation (.6).	B130	PDS	7.40	4,440.00
11/13/2024	communication with formal and informal objectors to the Motion to Abandon regarding the amended motion.	B130	PDS	0.30	180.00
11/13/2024	Running UCC searches; order abstract; emails related to same.	B130	KAH	0.60	180.00
11/13/2024	Prepare subpoenas; research registered agents for service of same.	B130	KAH	0.40	120.00
11/13/2024	draft and revise sale motion	B130	NJS	3.10	1,240.00
11/13/2024	Research and analyze response to NRW motion re: Stipulation, draft response.	B130	JDC	5.40	2,700.00
11/13/2024	Communication with SPC re: records motion (.60); Attention to W&T's response to records motion (.10)	B130	BWA	0.70	350.00
11/13/2024	Attention to Amended MT Abandon, Reject and Compromise; finalize all for filing; request service of same.	B130	KAH	0.50	150.00

11/13/2024	Meeting with Mr. Dykes regarding NRW compliance and other NRW issues; analysis of regulatory issues; review auction transcript for NRW related issues; review / revise Subpoena request to NRW; review document request; analysis of TSA issues related to NRW issues; review and revise objection to NRW request; review additional evidence issues (5.8); Meeting with Haygood Fishman team regarding records issues (.5); review and analyze of GI 18 and pipeline sale issues; tc with Mr. Lackey; UCC / Lien requests on same (.7); review and analyze VESCO proposal; UCC / Lien requests on same (.4); emails and analysis regarding document access (.4)	B130	WSR	7.80	4,680.00
11/13/2024	Continued research re issues in NRW stipulation motion	B130	AWM	1.50	300.00
11/13/2024	Meeting with R. Dykes re issues in NRW stipulation motion	B130	AWM	1.90	380.00
11/13/2024	Drafting subpoena exhibit for Subpoenas to CIMA, Array, and Opportune	B130	AWM	2.50	500.00
11/13/2024	Adding cites to Objection to NRW Stip Motion	B130	AWM	0.40	80.00
11/13/2024	Correspondence from R. Dykes re: document production for insurance counsel	B190	BWA	0.10	50.00
11/14/2024	Prepare document Sharefile for Kean Miller re Lewis and Lazard litigation	B190	KAH	0.20	60.00
11/14/2024	Attention to service requirements for records motion; emails related to same.	B190	KAH	0.40	120.00
11/14/2024	continue drafting/revising motion to sell	B130	NJS	2.30	920.00
11/14/2024	Analysis of potential assets to be sold and applicable security interests in same	B130	NJS	1.10	440.00
11/14/2024	Research and analyze response to NRW motion re: Stipulation, draft response (2.5); draft motion to escrow proceeds of production (1.5); follow up re: discovery sought from NRW, third parties (1).	B130	JDC	5.00	2,500.00
11/14/2024	Edit records motion, communication with LT re: same, oversee proper noticing of same	B130	BWA	3.60	1,800.00
11/14/2024	Attention to document production for counsel	B110	BWA	0.30	150.00
11/14/2024	Emails with M. Borrer, client re: distribution schedule for 401k plan (0.2); review distribution schedule (0.3)	B220	BAB	0.50	300.00
11/14/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.60	240.00
11/14/2024	Finalize subpoenas to A&M, Latham & Watkins and Moelis.	B130	KAH	0.40	120.00
11/14/2024	Revise certificate of service to subpoenas; emails related to same.	B130	KAH	0.30	90.00
11/14/2024	Order underlying UCC filings from multiple jurisdictions	B130	KAH	0.70	210.00
11/14/2024	Reviewed Motion for Order to Abandon	B130	AWM	1.40	280.00
11/14/2024	Research re require notice parties for abandonment	B130	AWM	1.80	360.00
11/14/2024	Compiling information re MLCJR, et al case for Hedron mediation for M. Warner	B190	AWM	1.50	300.00

11/14/2024	Review and analyze TSA as to NRW issues (1.1); tc with Mr. Dykes regarding TSA and other issues (.4); review proposed amendment to servitude and other exhibits to GI 18 PSA (1.2); tc with Trustee regarding same (.3); revising PSA on GI 18 and email to W&T Counsel (1.5); analysis of 363 sale issues and DIP issues for various sales (2.0)	B120	WSR	6.50	3,900.00
11/15/2024	continue analysis of property that may be sold and applicable security interests	B130	NJS	0.90	360.00
11/15/2024	continue drafting/revising trustee interim fee app	B160	NJS	2.10	840.00
11/15/2024	Research and analyze response to NRW motion re: Stipulation, draft response (2); draft motion to escrow proceeds of production (2); follow up re: discovery sought from NRW, third parties (.6); communications with R. Lamb re: NRW motion (.2); revise, serve discovery requests on NRW (.4).	B130	JDC	5.20	2,600.00
11/15/2024	Confirm service information for records motion, including communication with SPC re: same (1.20); Analysis of issues raised by W&T as to abandonment motion, assess best steps forward (.50)	B130	BWA	1.70	850.00
11/15/2024	review / revise subpoena / exhibits for NRW matters (.5); review lien and other sale issues GI 18 (.4); emails regarding pipeline ownership (.4)	B130	WSR	1.30	780.00
11/15/2024	additional emails and review of subpoena and discovery issues as to NRW matters (.6); email regarding Devon bonds (.4); email to W&T counsel regarding ownership of pipeline (.2)	B130	WSR	1.20	720.00
11/15/2024	review issues related to NRW / DOI; conference with DOI regarding NRW; follow up analysis on same	B130	WSR	1.20	720.00
11/15/2024	Research re necessary notice parties for abandonment	B130	AWM	2.10	420.00
11/15/2024	Finalizing subpoena exhibits for CIMA, Array, and Opportune	B130	AWM	0.50	100.00
11/15/2024	Drafting Trustee's 2nd set of requests for production to NRW re Stip Motion	B130	AWM	1.40	280.00
11/15/2024	Continued compiling information re MLCJR, et al case for Hedron mediation for M. Warner	B190	AWM	3.90	780.00
11/15/2024	Meeting with interior, W. Robbins, and J. Cangelosi re NRW issues	B130	AWM	0.20	40.00
11/15/2024	Meeting with Jamie and Will re NRW's Stip Motion	B130	AWM	0.20	40.00
11/15/2024	Attention to NRW subpoena issues	B130	BWA	0.60	300.00
11/18/2024	Revisions to mailing list for records motion; emails related to same.	B190	KAH	0.60	180.00
11/18/2024	Receipt of R. Dykes 11.15.24 w/e report and N. Zimmerman w/e invoice; update payables spreadsheet.	B210	KAH	0.20	60.00
11/18/2024	continue drafting/revising motion to sell property	B130	NJS	2.80	1,120.00
11/18/2024	Research and analyze response to NRW motion re: Stipulation, draft response (3); draft motion to escrow proceeds of production (4); revise, finalize subpoenas to third parties (1.5).	B130	JDC	7.80	3,900.00



11/18/2024	Continue working through notice issues for the records motion, finalizing service list (3.20); Analysis of W&T's correspondence re: abandonment motion issues (.50)	B130	BWA	3.70	1,850.00
11/18/2024	Attention to status of draft motion to employ non-testifying expert	B160	BWA	0.30	150.00
11/18/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	1.90	760.00
11/18/2024	Attention to revisions to subpoenas; arranging for service of same; researching agents for service; multiple emails re same	B130	KAH	1.80	540.00
11/18/2024	Emails related to Latham Watkins and Moelis documents; initial download/store.	B130	KAH	0.20	60.00
11/18/2024	Receipt/review of tax statements from Jefferson Parish; email to W. Robbins re same	B130	KAH	0.20	60.00
11/18/2024	Review GI 18 documents and ancillary documents (1.5); analyzing E21 Onshore control issues (.6); conference with W&T and Trustee regarding same (.3); follow up tc with Trustee (.2); Review and analyze Interior evidence and discovery issues (1.3); review and analyze proposed mediation spreadsheet (.4); Analyze abandonment issues (.5)	B130	WSR	4.80	2,880.00
11/18/2024	Continued compiling information re MLCJR, et al case for Hedron mediation for M. Warner	B190	AWM	5.20	1,040.00
11/18/2024	Conducted research re discovery to government agencies	B310	AWM	2.00	400.00
11/19/2024	Emails to/from abstractor re: abstract request for Energy XXI sale.	B120	KAH	0.30	90.00
11/19/2024	Revisions to mailing list for Records Motion	B190	KAH	0.20	60.00
11/19/2024	Finalize Records Motion and Order for Filing; attention to service of same.	B190	KAH	0.40	120.00
11/19/2024	Finalize Response to NRW Stipulation Motion	B130	KAH	0.20	60.00
11/19/2024	Run UCC searches on EPL Oil & Gas	B190	KAH	0.20	60.00
11/19/2024	continue drafting/revising motion to sell	B130	NJS	2.10	840.00
11/19/2024	internal communication re Special Counsel fees	B160	NJS	0.20	80.00
11/19/2024	continue drafting/revising application to employ hidden assets	B160	NJS	0.60	240.00
11/19/2024	Revise, finalize response to NRW motion re: Stipulation, prepare exhibits, prepare for filing (4.8); revise motion re: escrow (2).	B130	JDC	6.80	3,400.00
11/19/2024	Prepare and oversee records motion filing, communication with Trustee and service parties re: same (2.1); review W&T's comments re: abandonment motion, revisit sale order and PA re: same, drat responses (2.40);	B130	BWA	4.50	2,250.00
11/19/2024	Correspondence from Hidden Assets re: potential employment (.10); Attention to co-counsel fee issue (.20)	B160	BWA	0.30	150.00
11/19/2024	Correspondence from FileLink re: invoice, communication with paralegal re: same	B110	BWA	0.20	100.00

11/19/2024	Prepare for and participate in conference call with client re: 401k winddown (0.6); telephone conference and emails with M. Borrer re: same (0.6)	B220	BAB	1.20	720.00
11/19/2024	Review and multiple revisions to objection to NRW motion (1.8); emails to/from Trustee and tc with same (.3); emails to/from DIP counsel (.2); Emails to/from Mr. Dykes regarding various regulatory and other issues (.3); Review W&T listing / memo regarding abandonment (.6); forward materials on GI property to W&T (.2); review and analyze lien issues as to Venice and other properties (.7)	B130	WSR	5.80	3,480.00
	Review exhibits and other matters relating to Records motion before filing (1.9)				
11/19/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc. re NRW motion	B130	AWM	6.80	1,360.00
11/19/2024	Reviewing debtors' schedules and confirming information re debtors' assets for B. Altazan	B130	AWM	0.30	60.00
11/20/2024	communication with K. Huddle and others re DMR permits (.1); multiple communications with M. Warner and B. Barriere re potential stay violations by carrier in Hedron and Ida matters (.3); multiple communications with L. Phillips re (i) lien claimants' mediation, (ii) proposed stipulation, and (iii) new money DIP calculations (.2); review of, and comments and revisions to, mediation information requested by Trustee and related communications with A. Mock and J. Cangelosi (.9); prepare for and attend Zoom conference with A. Mock, J. Cangelosi, and W. Robbins re multiple NRW issues including outstanding discovery, further necessary discovery, and additional motion practice (1.5);	B130	PDS	3.00	1,800.00
11/20/2024	continue drafting/revising application to employ hidden assets	B160	NJS	0.70	280.00
11/20/2024	Began review of draft motion re NRW royalties.	B130	PDS	1.30	780.00
11/20/2024	Revise motion re: escrow (3.8); prepare for and participate in meeting with A&M re: document production (.5); update status of pending matters (1.5); schedule meeting re: NRW motion with J. Winkler (.2).	B130	JDC	6.00	3,000.00
11/20/2024	Multiple emails and telephone conference with M. Warner, M. Borrer re: 401k plan timeline and issues to wrap up	B320	BAB	0.70	420.00
11/20/2024	Email from M. Warner re: QDRO issue relating to 401k plan	B220	BAB	0.10	60.00
11/20/2024	Zoom call with A&M counsel re document production	B130	KAH	0.40	120.00
11/20/2024	Review and analysis of various asset sale issues (.8); Meetings regarding pending discovery and other NRW issues (.7); Analysis of NRW escrow issues (.80; Emails to/from Mr. Long; receive NDA; tc with Mr. Long regarding predecessor documents for JM Huber (.6)	B130	WSR	2.90	1,740.00
11/20/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc. re NRW motion	B130	AWM	1.30	260.00
11/20/2024	Continued compiling information re MLCJR, et al case for Hedron mediation for M. Warner	B190	AWM	0.30	60.00

11/20/2024	Meeting with D. Stewart, W. Robbins, and J. Cangelosi re case updates and discovery requests	B130	AWM	0.90	180.00
11/20/2024	Emailing M. Warner re Hedron mediation information document	B190	AWM	0.20	40.00
11/20/2024	Phone call with M. Warner re Hedron mediation information document	B190	AWM	0.10	20.00
11/20/2024	Creating Excel spreadsheet with Hedron mediation information for M. Warner	B190	AWM	2.10	420.00
11/21/2024	Comparison of Huber NDA to original.	B130	KAH	0.30	90.00
11/21/2024	continue drafting/revising application to employ hidden assets	B160	NJS	1.80	720.00
11/21/2024	continue drafting/revising venice sale motion	B130	NJS	2.40	960.00
11/21/2024	Revise motion re: escrow, draft proposed order (5); begin researching and drafting responses to NRW's three sets of discovery requests (3).	B130	JDC	8.00	4,000.00
11/21/2024	Telephone conference with M. Warner re: QDRO issues and interplay with 401k windup	B220	BAB	0.50	300.00
11/21/2024	Email with M. Warner re: litigation efforts of estate and distributions from 401k funds	B220	BAB	0.30	180.00
11/21/2024	Emails with client re: 401k payments, analyze further research needs re: expense compensability for expenses related to windup	B220	BAB	0.40	240.00
11/21/2024	communication with E. Ripley re opposition (.1); communication with J. Cangelosi and A. Mock re NRW discovery issues (.6); communication with B. Barriere re Hedron (.6); receipt and preliminary review of escrow motion (.7); communication with M. Warner re mediation (.4).	B130	PDS	2.40	1,440.00
11/21/2024	Attention to service of subpoenas; search for new address for CIMA Energy	B130	KAH	0.40	120.00
11/21/2024	Review / compare NDA; emails to Mr. Long regarding document review JM Huber (1.0); Analysis of Vesco transaction; emails from W&T counsel regarding pipeline purchase (.6); Review and revise Motion to Escrow Production Proceeds (2.5)	B130	WSR	4.10	2,460.00
11/21/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc. re NRW motion	B130	AWM	1.30	260.00
11/21/2024	Continued updating Excel spreadsheet with Hedron mediation information for M. Warner	B190	AWM	2.30	460.00
11/21/2024	Conducting research re Trustee's compensation for administration of debtors' 401k accounts	B220	AWM	1.90	380.00
11/21/2024	Communication with Veritrust re: executed NDA	B130	BWA	0.10	50.00



11/22/2024	communication with M. Warner re DIP questions for upcoming mediation (.2); communications with M. Warner re affiliated company (.1); communication with J. Cangelosi re Array subpoena (.1); communication with B. Barriere and M. Warner re Hedron mediation issues (.2); communication with W. Robbins re request for termination from LDQ (.1); communication with M. Warner and B. Barriere re D&O litigation questions re BP (.1); communication with T. Thriffley re potential purchase (.1); communication with J. Coleman and M. Warner re JW turnover (.1); communication with M. Dearman re Cox AR status (.1); communication with R. Dykes re billing (.1); communication with K. Heard re Moelis data (.1); call with B. Barriere and M. Warner re settlement with vendors (.7); review and revisions to NRW Royalties motion (2.3).	B130	PDS	4.30	2,580.00
11/22/2024	communication with N. Smeltz and B. Altazan re status of Hidden Assets' employment (.3); revisions to pre-bill and fee apps for SRBA, TPS-West, and Trustee (1.6).	B160	PDS	1.90	1,140.00
11/22/2024	Email from process server re service of CIMA Energy subpoena	B130	KAH	0.10	30.00
11/22/2024	Attention to Latham and Watkins document downloads; issues related to same; emails related to same.	B130	KAH	0.90	270.00
11/22/2024	Continue to trouble shoot issues with document downloads; emails to document producers related to same.	B130	KAH	1.80	540.00
11/22/2024	Revisions to invoice.	B160	KAH	1.40	420.00
11/22/2024	Research and draft responses to NRW's three sets of discovery requests (4.5); prepare for meeting with Spectrum (2.1).	B130	JDC	6.60	3,300.00
11/22/2024	continue drafting/revising MT sell pipeline to WT	B130	NJS	1.90	760.00
11/22/2024	further revisions to hidden assets employment application	B160	NJS	0.30	120.00
11/22/2024	Analysis of potential liens against pipeline	B130	NJS	0.30	120.00
11/22/2024	Attention to Hidden Assets employment applications	B160	BWA	0.40	200.00
11/22/2024	Attention to follow-up with Argo counsel	B140	BWA	0.20	100.00
11/22/2024	Analyze issues re: lien research on pipeline servitude	B130	BAB	0.50	300.00
11/22/2024	Review research cases re: expenses compensable from 401k relating to windup	B220	BAB	0.90	540.00
11/22/2024	Emails regarding various subpoena and discovery issues (.5); Review additional regulatory issues, including DEQ nonreporting issues (.6); Correspondence and TC with Pivach regarding sale of QB field (.4); Review and analyze JP Morgan Trust account and EPL Bank account issues (1.2); Review and revise SRBA, Trustee and CPA fee applications (2.0)  Review W&T pipeline sale; review and revise VESCO sale motion (1.1)	B130	WSR	5.80	3,480.00
11/22/2024	Continued researching re Trustee's compensation for administration of debtors' 401k accounts	B220	AWM	1.90	380.00
11/22/2024	Reviewing debtors' 401k plan documents	B220	AWM	0.90	180.00

11/22/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc.	B130	AWM	3.90	780.00
11/25/2024	Attention to status of subpoena service.	B130	KAH	0.10	30.00
11/25/2024	Receipt of N. Zimmerman w/e 11-22 payables and R. Dykes activity report; update payable spreadsheet.	B210	KAH	0.20	60.00
11/25/2024	Attention to Latham and Watkins document production; multiple emails related to same	B130	KAH	0.80	240.00
11/25/2024	Attention to A&M document production issues; multiple emails related to same.	B130	KAH	0.80	240.00
11/25/2024	Order additional UCC search for EPL in TX	B130	KAH	0.10	30.00
11/25/2024	Research and draft responses to NRW's three sets of discovery requests (5.5); prepare for meeting with Spectrum (2.5).	B130	JDC	8.00	4,000.00
11/25/2024	Prepare request for mortgage certificates from Plaquemines Parish	B130	KAH	0.30	90.00
11/25/2024	Analyze list from W&T re: acquired assets that, per W&T, shouldn't/can't be abandoned (1.20); Communication from Trustee re: abandonment list (.10); Attention to equipment notice (.40)	B130	BWA	1.70	850.00
11/25/2024	continue revising SRBA first interim fee application	B160	NJS	0.60	240.00
11/25/2024	continue revising TPS West first interim fee application	B160	NJS	0.60	240.00
11/25/2024	email to B. Dassa for updated form 2	B160	NJS	0.10	40.00
11/25/2024	continue drafting/revising W&T pipeline sale motion	B130	NJS	2.50	1,000.00
11/25/2024	circulating TPS west fee application and explanation to R. Anderson for review/approval	B160	NJS	0.70	280.00
11/25/2024	continue analysis of UCCs filed re venice oil property	B130	NJS	0.30	120.00
11/25/2024	email to K. Elmer re effective date of employment for non-testifying expert	B160	NJS	0.20	80.00
11/25/2024	communication with parties re discovery requests (.3); analysis of discovery plan for NRW motions and related communication with J. Cangelosi (1.7); multiple communications with M. Warner and B. Barriere re Hedron mediation (.9).	B130	PDS	2.90	1,740.00
11/25/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	BWA	2.10	1,050.00
11/25/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.20	80.00
11/25/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.20	80.00
11/25/2024	Emails and analysis of subpoena and document production issues (.5); Emails regarding Talos settlement and tc with Trustee regarding same (.4); Analysis of VESCO sale lien issues (.6); review and revise Sale Motion (2.8); Emails to/from W&T counsel regarding sale and other issues; tc with Trustee regarding same (.5)	B130	WSR	4.80	2,880.00
11/25/2024	Creating email search terms for discovery requests re NRA Stip Motion	B130	AWM	2.30	460.00

11/25/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc.	B130	AWM	5.50	1,100.00
11/26/2024	Continued follow up re: document production issues	B130	KAH	0.30	90.00
11/26/2024	multiple communications with M. Warner and B. Barriere re Hedron mediation and settlement (1.3); communication with L. Phillips re Hedron mediation and stipulation (.4); communication with R. Kuebel re NRW litigation and other issues (.9); communication with B. Kadden re Lineholders' settlement (.8); communication with J. Cangelosi re NRW litigation (.2); detailed review of NRW royalty motion and related communications with W. Robbins and J. Cangelosi (1.4).	B130	PDS	5.00	3,000.00
11/26/2024	incorporating form 2 information into SRBA, trustee, and TPS interim fee apps and circulating SRBA and trustee interim fee applications to trustee	B160	NJS	0.60	240.00
11/26/2024	continue drafting/revising W&T pipeline sale motion	B130	NJS	1.30	520.00
11/26/2024	continue revising application to employ hidden assets	B160	NJS	0.80	320.00
11/26/2024	Research and draft responses to NRW's three sets of discovery requests (4); prepare for and participate in meeting with Spectrum (1.5).	B130	JDC	5.50	2,750.00
11/26/2024	Correspondence from R. Kuebel re: abandonment motion order	B130	BWA	0.10	50.00
11/26/2024	Email from B. Kadden re: waiver	B190	BWA	0.10	50.00
11/26/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	2.40	960.00
11/26/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.10	40.00
11/26/2024	Analysis of employment of non-testifying expert in contingency fee litigation.	B160	NJS	0.20	80.00
11/26/2024	Review / revise VESCO sale motion (3.2); email to VESCO Counsel (.3); review UCC records as to VESCO assets (.4); Tc with W&T Counsel regarding GI 18 and other issues (.4); review subsidiary report and forward same to W&T Counsel (.5); Conference with Spectrum and counsel regarding auction / NRW issues and regarding other assets (.5)	B130	WSR	6.10	3,660.00
	Tc with Mr. Phillipe regarding Talos; Email to Talos regarding settlement (.3)				
	Attention to Fishman fee app and carveout issues (.5)				
11/26/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc.	B130	AWM	3.60	720.00
11/26/2024	Meeting with B. Brown to discuss Trustee's compensation for services rendered under 11 USC 704(a)	B220	AWM	0.10	20.00
11/26/2024	Drafting memo for B. Brown re Trustee's compensation for services rendered under 11 USC 704(a)	B220	AWM	2.50	500.00
11/26/2024	Zoom meeting with J. Cangelosi, W. Robbins, Joe Winkler, and Ben Kadden to discuss the debtors' auctions re NRW issues	B130	AWM	0.60	120.00

11/26/2024	Call with J. Cangelosi and W. Robbins to discuss status of creating search terms for discovery requests re NRW issues	B130	AWM	0.20	40.00
11/26/2024	Drafting notes from meeting with J. Cangelosi, W. Robbins, Joe Winkler, and Ben Kadden re NRW issues	B130	AWM	1.10	220.00
11/26/2024	Review and edit Hidden Assets employment application and related documents (1.20); Communication with associate and SPC	B160	BWA	1.20	600.00
11/27/2024	emails and analysis regarding nondebtor sub issues (1.2); review and forward W&T pipeline PSA (.7);	B130	WSR	1.90	1,140.00
11/27/2024	attention to CPA, FA and SRBA fee applications	B130	WSR	0.50	300.00
11/27/2024	Finalize SRBA and Trustee Fee Applications; emails related to same.	B160	KAH	1.20	360.00
11/27/2024	Correspondence from Hidden Assets re: employment application	B160	BWA	0.20	100.00
11/27/2024	finalize SRBA and trustee fee applications and emails with K. Heard re filing and serving same	B160	NJS	0.60	240.00
11/27/2024	email to R. Anderson re fee application and confirmation to move forward with filing	B160	NJS	0.10	40.00
11/27/2024	Emails with M. Borrer, client re: distribution requests from 401k participants	B220	BAB	0.20	120.00
11/27/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA, etc.	B130	AWM	5.80	1,160.00
<b>Total</b>				<b>465.50</b>	<b>\$204,200.00</b>

**FEE EARNER SUMMARY**

<b>Fee Earner</b>		<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
PDS	Paul Douglas Stewart, Jr.	57.00	600.00	34,200.00
WSR	William S. Robbins	79.30	600.00	47,580.00
AWM	Abigail W. Mock	111.40	200.00	22,280.00
BAB	Brandon A. Brown	5.80	600.00	3,480.00
BWA	Brooke W. Altazan	33.40	500.00	16,700.00
JDC	Jamie D. Cangelosi	106.40	500.00	53,200.00
KAH	Kimberly A. Heard	21.20	300.00	6,360.00
NJS	Nicholas J. Smeltz	51.00	400.00	20,400.00

**TASK SUMMARY**

<b>Task</b>		<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
B110	Case Administration	1.20	500.00	600.00
B120	Asset Analysis and Recovery	11.80	592.37	6,990.00
B130	Asset Disposition	376.00	451.25	169,670.00
B140	Relief from Stay/Adequate Protection Proceedings	0.20	500.00	100.00
B150	Meetings of and Communications with Creditors	0.30	600.00	180.00
B160	Fee/Employment Applications	40.10	416.96	16,720.00
B190	Other Contested Matters(excluding assumptions/reje	18.80	220.74	4,150.00
B210	Business Operations	2.20	300.00	660.00
B220	Employee Benefits/Pensions	11.40	343.86	3,920.00
B240	Tax Issues	0.80	487.50	390.00
B310	Claims Administration and Objections	2.00	200.00	400.00
B320	Plan and Disclosure Statement (Including Business	0.70	600.00	420.00

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
11/5/2024	Texas Secretary of State database fees for entity inquiries	4.00
11/10/2024	Corporate documents from Delaware	20.00
11/10/2024	Corporate documents from Delaware	20.00
11/11/2024	Copy of tax bill for parcel numbers 3611119013 and 3611119000	4.00
11/11/2024	Certified Copy of Pleading No. 21 in AP # 24-2004	20.50
11/12/2024	Corporate documents from Delaware	96.00
11/12/2024	Corporate documents from Delaware	96.00
11/13/2024	Texas Secretary of State database fees for entity inquiries	3.00
11/13/2024		64.75
	TransUnion for UCC searches	
11/14/2024	Search for UCC filings.	1.50
11/14/2024	Texas Secretary of State database fees for entity inquiries	1.00
11/14/2024	Texas Secretary of State database fees for entity inquiries	2.00
11/14/2024	Service by BK ATTORNEY SERVICES, LLC d/b/a CertificateofService.com	5,908.61
11/18/2024	Service of subpoena on Array Petroleum, LLC	135.00
11/18/2024	Service of subpoena on CIMA Energy, LP	85.00
11/18/2024	Service of final subpoena on Opportune LLP	85.00
11/18/2024	Service of subpoena (updated) on CIMA Energy, LP	85.00
11/18/2024		25.90
	TransUnion for UCC searches	
11/19/2024	Texas Secretary of State database fees for entity inquiries	1.00
11/19/2024		38.85
	TransUnion for UCC searches	
11/19/2024	Service by BK ATTORNEY SERVICES, LLC d/b/a CertificateofService.com	388.04
11/21/2024	Service of subpoena on CIMA Energy, LP	85.00
11/21/2024		25.90
	TransUnion for UCC searches	
11/22/2024	Texas Secretary of State database fees for entity inquiries	1.00
11/25/2024	Run 2 mortgage certificates	40.00
11/26/2024	UCC Search re: EPL Oil & Gas LLC in Texas	26.00
11/27/2024	UCC Search on EPL Oil & Gas, LLC, Energy XXI GOM, LLC, Cox Operating, L.L.C. and Energy XXI GOM, LLC	276.00
11/30/2024	Copies for November 2024	356.00
	<b>Total DISBURSEMENTS</b>	<b>\$7,895.05</b>
	New Charges	\$212,095.05

Previous Balance	\$709,463.85
<b>Balance Due</b>	<b><u>\$921,558.90</u></b>

Trust Statement

Date	Description	Receipts
12/12/2024	Whitney Bank	5,000.00
	Wire from W&T Offshore for deposit for pipeline purchase in Cox	
	<b>Total</b>	<hr/> <b>\$5,000.00</b>
	<b>Trust Balance</b>	<b>\$5,000.00</b>





SRBA respectfully submits this Monthly Fee Statement seeking compensation for reasonable, actual and necessary services and expenses rendered by SRBA on behalf of the Trustee during the Statement Period:

STATEMENT PERIOD SUMMARY	
Name of Applicant:	Stewart Robbins Brown & Altazan LLC
Applicant's Role in Case:	Chapter 7 Trustee's General Counsel
Date of Retention:	June 12, 2024 (Doc. 2116) retroactive to May 6, 2024
Period Covered by this Statement:	Dec 1, 2024 through Dec 31, 2024
Number Monthly Fee Statements:	Eighth
STATEMENT PERIOD SUMMARY OF FEES AND EXPENSES	
Total Statement Period Fees	\$280,080.00
Total Interim Fees (80%) Requested	\$224,064.00
Total Expenses Requested	\$2,942.48
Total Interim Remuneration Requested (exclusive of holdback):	\$227,006.48
STATEMENT PERIOD SUMMARY FOR ATTORNEYS	
Total attorney fees requested in this statement:	\$277,410.00
Total actual attorney hours covered by this statement:	525.80
Average hourly rate for attorneys:	\$514.29
STATEMENT PERIOD SUMMARY FOR PARAPROFESSIONALS	
Total paraprofessional fees requested in this statement:	\$2,670.00
Total actual paraprofessional hours covered by this statement:	8.9
Average hourly rate for paraprofessionals:	\$300.00

**In accordance with the *Order Granting Trustee's Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee's Professionals* [Docket no. 1831], each party receiving notice of the monthly fee statement will have until 5:00 p.m. (Prevailing Central Time), 10 days after the filing of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 10-day period, the Trustee is authorized to pay the professional the amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

1. The following chart presents certain information regarding the SRBA professionals whose work on these chapter 7 cases compensation is sought in this Monthly Fee Statement sorted by professional, along with each professionals' title, earliest bar passage (if applicable), highest rate, blended rate, total amount billed, and percentage of billings:

Professional	Title	Date Initial Bar License	Total Time	Blended Rate	Highest Rate	Total Amount Billed	Percentage Billed
<u>Brandon A. Brown</u>	Member	LA - 1998	45.50	\$600.00	\$600.00	\$27,300.00	9.75%
<u>Brooke W. Altazan</u>	Member	LA - 2009	52.40	\$500.00	\$500.00	\$26,200.00	9.35%
<u>Kimberly A. Heard</u>	Paralegal	N/A	8.90	\$300.00	\$300.00	\$2,670.00	0.95%
<u>Nicholas J. Smeltz</u>	Associate	LA - 2019	28.00	\$400.00	\$400.00	\$11,200.00	4.00%
<u>Paul D. Stewart, Jr.</u>	Member	LA - 1996	122.10	\$600.00	\$600.00	\$73,260.00	26.16%
<u>William S. Robbins</u>	Member	LA - 1996	105.00	\$600.00	\$600.00	\$63,000.00	22.49%
<u>Abigail W. Mock</u>	Associate	LA - 2024	99.50	\$400.00	\$400.00	\$39,800.00	14.21%
<u>Jamie D. Cangelosi</u>	Of Counsel	LA - 2000	73.30	\$500.00	\$500.00	\$36,650.00	13.09%
<b>Grand Total</b>			<b>534.70</b>	<b>\$482.17</b>	<b>\$600.00</b>	<b>\$280,080.00</b>	<b>100.00%</b>

2. The following chart provides a summary of fees incurred during the Statement Period sorted by ABA bankruptcy task code, along with the total time, percentage of time, total billed amount, and percentage of amount for each task:

Task	Total Time	Percent of Time	Total Amount	Percent of Amount
b110 Case Administration	1.1	0.21%	\$550.00	0.20%
b130 Asset Disposition	422.8	79.07%	\$223,570.00	79.82%
b140 Relief from Stay/Adequate Protection	3.5	0.65%	\$2,040.00	0.73%
b190 Other Contested Matters	13.8	2.58%	\$6,990.00	2.50%
b210 Business Operations	6	1.12%	\$2,560.00	0.91%
b220 Employee Benefits/Pensions	3.1	0.58%	\$1,860.00	0.66%
b310 Claims Administration and Objections	74.7	13.97%	\$38,250.00	13.66%
b160 Fee/Employment Applications	7	1.31%	\$3,180.00	1.14%
b240 Tax Issues	2.7	0.50%	\$1,080.00	0.39%
<b>Grand Total</b>	<b>534.7</b>	<b>100.00%</b>	<b>\$280,080.00</b>	<b>100.00%</b>

3. The following chart provides a summary of expenses incurred during the Statement Period sorted by category of expenses:

SUMMARY OF EXPENSES	
Expense Description	Expenses Amount
Copies	\$171.60
Service of Pleadings	\$1,543.13
Corporate Records	\$1,201.00
EDI Costs	\$26.75
<b>Grand Total</b>	<b>\$2,942.48</b>

4. SRBA's invoice covering the Statement Period and providing a detailed statement of both (a) hours spent rendering legal services to the Trustee and (b) disbursements made or incurred by SRBA in connection with services performed on behalf of the Trustee during the Statement Period is attached hereto as **Exhibit "A"**.

5. Pursuant to the Interim Compensation Order, SRBA seeks payment of \$227,006.48 from the Trustee for the Statement Period, representing (a) 80% of SRBA's total fees for services rendered and (b) 100% of the total expenses incurred during the Statement Period.

6. Although every effort has been made to include all fees and expenses incurred during the Statement Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Statement Period. SRBA reserves the right to seek allowance of such fees and expenses not included herein.

Dated: March 25, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN  
& ALTAZAN, LLC**

By: /s/ Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
William S. Robbins (Tx. Bar # 24100894)  
[wrobbins@stewartrobbins.com](mailto:wrobbins@stewartrobbins.com)  
Brandon A. Brown (Tx. Bar # 24104237)  
[bbrown@stewartrobbins.com](mailto:bbrown@stewartrobbins.com)  
Brooke W. Altazan (Tx. Bar # 24101002)  
[baltazan@stewartrobbins.com](mailto:baltazan@stewartrobbins.com)  
301 Main Street, Suite 1640  
Baton Rouge, LA 70801-0016  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467

***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**MLCJR LLC, *et al.***  
**EXHIBIT A**

**DETAILED TIME AND EXPENSE ENTRIES**  
**Time Period – December 1, 2024 – December 31, 2024**



301 Main Street, Suite 1640  
Baton Rouge, LA 70821  
225-231-9998

Michael D. Warner  
440 Louisiana Ave., Suite 900  
Houston, TX 77002  
USA

March 25, 2025

File #: 119-001  
Invoice #: 1594

**RE:** In re MLCJR LLC & M21K, LLC

DATE	DESCRIPTION	Task	LAWYER	HOURS	AMOUNT
12/2/2024	Finalize November payables.	B210	KAH	0.60	180.00
12/2/2024	Finalize TPS West Fee App and order granting same.	B160	KAH	0.40	120.00
12/2/2024	multiple communications with R. Dykes and W. Robbins re state regulatory creditor (.3); multiple communications with Trustee and staff re monthly expenses (.2).	B210	PDS	0.50	300.00
12/2/2024	multiple communications with Hidden Asset folks and related communications with Trustee.	B160	PDS	0.20	120.00
12/2/2024	Communication with Trustee re: Hidden Assets status	B160	BWA	0.20	100.00
12/2/2024	continue drafting/revising application to employ hidden assets llc and related engagement agreement	B160	NJS	2.10	840.00
12/2/2024	continue analysis of sale issues	B130	NJS	0.70	280.00
12/2/2024	Review and analyze NRW discovery requests, Debtor documents (2.7); communications with A&M re: document production (.4).	B130	JDC	3.10	1,550.00
12/2/2024	communication with F. Laud. re Lienholders' mediation (.2); communication with M. Warner and B. Barriere re Hedron mediation (.1); communication with W. Robbins re settlement (.1); communication with L. Phillips re lienholders' settlement and Lender stipulation (.8); communication with M. Warner and W. Robbins re multiple sale issues (.3); multiple communications with S. Lackey and W. Robbins re various sales (.2); multiple communications with J. Cangelosi and A. Mock re NRW-related discovery (.5);	B130	PDS	2.20	1,320.00
12/2/2024	Multiple emails with client, M. Borrer re: 401k meeting (0.2), emails with client re: article on retirement plan winddown issues, review and analyze same (1.0); prepare for and participate in meeting re: 401k windup (0.7)	B220	BAB	1.90	1,140.00
12/2/2024	Analyze issues with research on burdens to offshore pipeline servitude	B130	BAB	0.90	540.00
12/2/2024	Invoice from FileLink, communication with paralegal re: AP (.20); Communication with Trustee re: monthly APs (.50); Correspondence from SPC re: Dallas documents (.10)	B210	BWA	0.80	400.00

12/2/2024	Emails from Talos / DIP Lender regarding settlement (.2); emails to/from Trustee (.3); Review Decom orders (1.0); Emails to/from W&T Counsel regarding pipeline PSA and Decom Order (.3); emails to/from Trustee (.2); Review and analyze lienholder / DIP dispute issues and positions as to Trustee actions (1.8); tc with counsel for Lienholder regarding same (.3); Review / analyze penalties assessed for nonreporting and forward same to Trustee (.4)	B130	WSR	4.50	2,700.00
12/2/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA relating to the NRW motion	B130	AWM	3.00	1,200.00
12/3/2024	Review / revise MT sell 18141 pipeline (1.7); emails regarding lien search as to same (.4); emails from W&T regarding various purchase issues (.5); tc with Trustee regarding same and other issues (.3); emails to/from VESCO counsel (.4); emails and analysis as to M&M issues and decom issues (1.1)	B130	WSR	4.40	2,640.00
12/3/2024	Review and analyze NRW discovery requests, Debtor documents (1.6); draft list of documents to request from Spectrum, circulate (1.6); communications with A&M re: document production (.2).	B130	JDC	3.20	1,600.00
12/3/2024	Multiple emails with O&G counsel re: possible abstractor options for offshore pipeline servitude	B130	BAB	0.60	360.00
12/3/2024	Correspondence from SPC re: Dallas documents	B130	BWA	0.10	50.00
12/3/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA relating to the NRW motion	B130	AWM	4.40	1,760.00
12/4/2024	Email to PDS, W. Robbins and B. Altazan re October MFS and November payables.	B210	KAH	0.20	60.00
12/4/2024	Telephone call with CSC Financial re: pending UCC requests.	B130	KAH	0.20	60.00
12/4/2024	Docket review for status of Talos Lift Stay hearing.	B140	KAH	0.20	60.00
12/4/2024	Attention to December payables.	B210	KAH	0.20	60.00
12/4/2024	Attention to UCC request; email to CSC re Delaware UCC's for EPL	B130	KAH	0.20	60.00
12/4/2024	revising VESCO sale motion and application to employ portions	B130	NJS	1.00	400.00
12/4/2024	communication with Trustee and B. Kadden re requested releases for Lienholders (.1); communication with R. Lamb re abandonment and other issues (.1); communication with M. Bishop re abandonment motions and requested extension (.2); communication with J. Bailey re records abandonment motion (.2); multiple communications with M. Warner re abandonment motion and other issues (.5); communication with W. Robbins and R. Dykes re reporting delinquencies (.2).	B130	PDS	1.30	780.00
12/4/2024	Attention to monthly fee statements for professionals	B160	BWA	0.50	250.00
12/4/2024	Review and analyze NRW discovery requests, Debtor documents.	B130	JDC	1.50	750.00

12/4/2024	Communication with SPC and Trustee re: Dallas records (1.60); Telephone conference with Veritrust re: records status (.20); Communication with R. Kuebel (.10), J. Bailey (.20), M. Bishop (.20), DOJ/Interior (.40), and C. Carlson re: records (.20), and analysis of same (1.10)	B130	BWA	4.00	2,000.00
12/4/2024	Attention to outstanding AP	B210	BWA	0.30	150.00
12/4/2024	Emails regarding Talos hearing and settlement (.3); Analysis and Emails to/from Lackey regarding GI 18 and Pipeline; tc with Trustee regarding same (.7); Revising VESCO Motion and Order (1.5); Review correspondence from Mr. Carleson regarding document issues and review related issues (.5); Review correspondence from counsel for Crescent GIGS regarding pipeline modification / no objection and forward same to Mr. Dykes (.6); Analyze NRW issues and email from Mr. Dykes (.4); Analysis of Erath Oil issues and follow up with NRW counsel (.8); Tc with abstractor regarding 18141 pipeline and correspondence regarding same and regarding mortgage certificate (.5)	B130	WSR	5.30	3,180.00
12/5/2024	Receipt of underlying UCC docs for EPL Oil & Gas.	B130	KAH	0.10	30.00
12/5/2024	Inventory of docs subpoenaed vs received; emails related to same.	B130	KAH	1.20	360.00
12/5/2024	monitor email communications and draft pleadings relating to the employment of Hidden Assets.	B160	PDS	0.10	60.00
12/5/2024	monitor settlement communications with H. James re abandonment of records motion (.1); analysis of issues relating to the potential sale of the Erath inventory in advance of upcoming meeting (.5); monitor communications and pleadings relating to Venice Oil Inventory and lien issues (.2); monitor communications relating to Special Counsel's review of records prior to abandonment (.1); monitor communications regarding potential sale of Energy XXI Onshore assets (.1); call with M. Warner re NRW, Assigned Claims, and other issues (1.4); communication with Trustee and Special Counsel re issues pertaining to potential D&O claims, including litigation consultants and assignment of direct claims to the Trustee (.8); communication with Trustee and Fishman re date and time for a Zoom re certain Chapter 5 issues (.1); communication with J. Cangelosi and K. Heard re NRW document productions (.2); communication with J. Cangelosi re document requests to witness in NRW matters (.2); communication with L. Phillips re Lender Stipulation (.6); communication with M. Warner and B. Barriere re complaint (.2); analysis of objections to abandonment motion and Trustee's analysis of resolution (.8).	B130	PDS	5.30	3,180.00
12/5/2024	attention to issues regarding Hidden Assets employment	B160	NJS	0.10	40.00
12/5/2024	Analysis of NRW's assertion of interest in Erath oil inventory	B130	NJS	0.70	280.00
12/5/2024	circulating Hidden Assets employment application to Trustee for review/approval	B160	NJS	0.20	80.00
12/5/2024	Analysis of issues related to Hidden Assets (.30) and non-testifying expert (.10) employment	B160	BWA	0.40	200.00



12/5/2024	Correspondence to/from Mr. Dykes regarding various M&M and sale issues (.4); analysis regarding Erath inventory pleadings (.4); review and analyze request of Crescent GIGS and email to/from Trustee and to/from Crescent GIGS counsel (.7); analysis and modification of language as to EXXI Pipeline requirements in W&T sale, and emails and tc with Trustee regarding same (1.0); email and tc with W&T counsel (.3); review and revise W&T pleadings / PSA (.5); email from Mr. Levitt and analysis regarding Devon Bonds (1.2)	B130	WSR	4.50	2,700.00
12/5/2024	multiple communications with M. Bishop re GOM Shelf's issues with abandonment order (.2); Zoom with Trustee and Special Counsel re litigation records of Debtor and affiliates (.5); revisions to (a) proposed order on MT Abandon, Reject, and Compromise, (b) related CONA, and related communications with M. Bishop, A. Long, N. Parker, and B. Altazan (3.1); communication with L. Phillips re Lenders' Stipulation and other issues (.4); receipt and preliminary review of DOJ admin claim motion and related communications with W. Robbins, J. Cangelosi, and A. Mock (1.5); communication with M. Dendinger re records (.1); communication with R. Kuebel re abandonment (.4); communication with B. Barriere re third-party claims (.5); communication with L. Phillips re stipulation (.2);	B130	PDS	6.90	4,140.00
12/5/2024	Review/analyze pleadings re AXIP	B130	NJS	0.20	80.00
12/5/2024	Communication with counsel for EP re: records motion, analysis of same (1.30); Telephone conference and email communication with Trustee and SPC re: Dallas records (1.40)	B130	BWA	2.70	1,350.00
12/5/2024	Reviewing debtors' emails in Mimecast re the Auction, PSA relating to the NRW motion	B130	AWM	4.20	1,680.00
12/5/2024	Conducting research on the sale issues re co-owned property	B130	AWM	4.50	1,800.00
12/5/2024	Emails and analysis regarding EPL Document requests	B190	WSR	0.60	360.00
12/5/2024	Review and analyze discovery requests, Debtor documents relating to the NRW motion	B130	JDC	1.20	600.00
12/6/2024	phone call with AXIP in house counsel re property disposition	B130	NJS	0.10	40.00
12/6/2024	internal emails with D. Stewart and W. Robbins re conversation with AXIP counsel and matters to move forward	B130	NJS	0.30	120.00
12/6/2024	Review/analyze A. Mock memo re selling property with disputed interest	B130	NJS	0.70	280.00
12/6/2024	Review/analyze EPL UCC documents retrieved from Delaware Secretary of State	B130	NJS	0.30	120.00
12/6/2024	Analysis of assets subject to turnover and related communications with B. Brown and W. Robbins.	B130	PDS	0.30	180.00

12/6/2024	Telephone conference and email communication with EP counsel re: records motion, analysis of same (1.20); Telephone conference with SPC re: Dallas records (.40); Communication with M. Bishop (1.10), R. Kuebel (.10), M. Dendinger (.50), and IT (.10) re: records motion, analysis of same; Analysis of Shell's request for clarification re: abandonment motion exhibit (.80)	B190	BWA	4.20	2,100.00
12/6/2024	Draft responses to discovery requests, review Debtor documents.	B130	JDC	4.10	2,050.00
12/6/2024	Review and revise stipulation re: Devon trust agreement, analyze Devon Trust agreement and possible issues with same	B140	BAB	2.10	1,260.00
12/6/2024	Review and analyze US app for admin expense for unpaid royalties	B310	BAB	1.10	660.00
12/6/2024	Analyze issues with possible estate entitlement to funds in chase account to which Devon claims a trust agreement is in place, analyze strategy moving forward on same	B140	BAB	1.20	720.00
12/6/2024	Attention to documents produced by A&M; uploading to Everlaw relating to the NRW motion	B130	KAH	0.40	120.00
12/6/2024	Review/analyze Interior chapter 7 admin expense claim	B310	NJS	0.40	160.00
12/6/2024	phone call to T. Scannel (AXIP) re returning corporate counsel's call	B130	NJS	0.10	40.00
12/6/2024	Drafting research memo regarding sale of co-owned property	B130	AWM	4.20	1,680.00
12/6/2024	Reviewing Exhibit 1 to Trustee's Motion to Abandon and comparing it to the Debtors' schedules	B130	AWM	1.80	720.00
12/6/2024	Research re UC admin claim	B310	AWM	1.00	400.00
12/6/2024	Receive/review Motion for Admin / Royalties and analysis of defenses (1.2); Conference with counsel for EP Energy regarding document / abandonment issues (.4); tc with Rick Kuebel regarding same (.5); emails from various predecessors regarding same (.4); analysis of document storage and access issues; email to IP rep regarding same (1.4); conference call with Barrier team and Trustee regarding Dallas documents and related issues (.4); Review and analyze Devon Energy escrow / trust request (.5); review bank records of JP Morgan / Chase and analysis of trust / escrow issues (1.3); Review and analyze Erath oil issues (.5); emails to/from Stone Pigman regarding call, and ownership claims (.4); review procedural issues as to same (.6); .Emails and tc with Mr. Dykes regarding various pending issues (.4)	B130	WSR	7.90	4,740.00
12/7/2024	Emails to/from Mr. Dykes regarding inventory, royalty and servitude / ROW issues (.4); revising PSA / ABOS for Pipeline 18141 (1.0); revising Motion and Order as to same (1.2); emails to Trustee regarding same (.2); revising GI 18 PSA (.7); review and analyze equity and suggest signature blocks (.6)	B130	WSR	4.10	2,460.00
12/8/2024	review of, and comments and revisions to, escrow motion and related communications with J. Cangelosi and W. Robbins.	B130	PDS	1.30	780.00

12/9/2024	Attention to December payables; emails from N. Zimmerman and R. Dykes re same.	B210	KAH	0.20	60.00
12/9/2024	Attention to Hidden Assets employment	B160	BWA	0.40	200.00
12/9/2024	Attention to W&T request for expedited hearing on sale motion	B130	BWA	0.30	150.00
12/9/2024	Correspondence regarding No Objection requests (.3); multiple emails and tc's with Trustee regarding W&T offer on 18141, Motion and Order (1.5); multiple emails to/from Mr. Lackey regarding same (1.5); correspondence to/from Trustee regarding other asset issues (.8); review Interior Admin Motion (.5); review and revise Emergency Motion to Escrow NRW proceeds (2.0)	B130	WSR	6.60	3,960.00
12/9/2024	Revise motion for escrow, bonding deadline (1.9); communications with B. Kadden re: document production (.2).	B130	JDC	2.10	1,050.00
12/9/2024	Review and analyze research re: discovery to Interior on admin claim	B310	BAB	0.80	480.00
12/9/2024	Analysis of proceeding to determine whether procedures are applicable to issue discovery to United States agency in light of admin expense	B310	NJS	0.40	160.00
12/9/2024	Telephone conference and email communication with EP counsel re: records motion, analysis of same and attention to login setup issues (1.4); Telephone conference and email communication with GOM Shelf counsel re: records motion and analysis of same (1.40); Communication with J. Bailey re: records motion (.10); Communication with M. Dendinger re: records motion (.10); Communication with Ryan counsel re: NDA, attention to same (.30); Communication with DOJ/Department of Interior re: records motion (.20)	B130	BWA	3.50	1,750.00
12/9/2024	Continued conducting research on how to request discovery on a government agency	B310	AWM	1.00	400.00
12/9/2024	Drafting research memo on how to request discovery on a government agency	B310	AWM	7.00	2,800.00
12/9/2024	Review and analyze electronic access issues (.5); conference call with EP Energy and counsel regarding document access issues (.3); follow up emails and analysis regarding same (.6)	B130	WSR	1.40	840.00
12/10/2024	Revisions to November and December payables; emails related to same.	B210	KAH	0.30	90.00
12/10/2024	reviewing materials to prepare for meeting re selling Erath inventory	B130	NJS	0.40	160.00
12/10/2024	further revisions to VESCO sale motion	B130	NJS	0.40	160.00
12/10/2024	Edit destruction notice, communication with Trustee re: same	B130	BWA	0.70	350.00

12/10/2024	Emails to/from Mr. Dykes regarding various assets for sale (.4); review and analyze Devon escrow / trust account issues (1.7); email to Devon counsel regarding same (.3); emails regarding W&T purchase issues (.4); emails regarding liens (.3); emails regarding Vesco issues (.4); analysis of abandonment issues, retroactivity (.5); tc with Mr. Dykes regarding NRW transition and other issues (.5); revising NRW Escrow motion (.1.2)	B130	WSR	5.70	3,420.00
12/10/2024	Revise and forward document requests to B. Kadden, J. Winkler (1); revise motion for escrow, bonding deadline (2); research issues raised in Interior's request for payment of administrative expenses (1).	B130	JDC	4.00	2,000.00
12/10/2024	Analyze strategy for dealing with Devon funds	B130	BAB	0.60	360.00
12/10/2024	Revise communication to client re: Devon trust account issue	B130	BAB	0.40	240.00
12/10/2024	Draft/revise settlement language and communication with M. Bishop and J. Ormiston re abandonment order and related communications with B. Altazan, A. Mock, and W. Robbins (1.8); communication with creditors re records abandonment motion (.1); communication with L. Phillips re stipulation (.3); revised settlement language re abandonment order and related communications with M. Bishop and J. Ormiston (1.4); revisions to NRW escrow motion and related communication with W. Robbins (3.1).	B130	PDS	6.70	4,020.00
12/10/2024	Attention to account payables for prior month	B210	BWA	0.60	300.00
12/10/2024	Communication with C. Carlson (EP), attention to login logistics and communication with Trustee re: same (1.20); Review/edit GOM Shelf redlines to NDA and records motion proposed order, communication with counsel re: same (1.40); Communication with J. Bailey (.30), E. Ripley (.60) re: records motion; Review/analyze GOM Shelf and Shell's questions re: abandonment motion exhibit (.90)	B130	BWA	4.40	2,200.00
12/10/2024	Reviewing and comparing Debtors' schedules and Trustee's Motion to Abandon to answer question for GOM Shelf's counsel	B130	AWM	2.70	1,080.00
12/10/2024	Drafting email to Shell's counsel re Trustee's Motion to Abandon Exhibit 1	B130	AWM	1.50	600.00
12/10/2024	Conducting research on issues under § 554	B130	AWM	0.80	320.00
12/10/2024	Analysis of records access / electronic issues and correspondence to trustee regarding same (.7); emails to/from Chevron counsel regarding records issues (.4); review notice of electronic asset destruction (.4)	B130	WSR	1.50	900.00
12/11/2024	Prepare Notice of Appearance in adversary proceeding.	B190	KAH	0.30	90.00
12/11/2024	Analysis of liens against vesco facility and oil	B130	NJS	1.60	640.00
12/11/2024	email to R. Dykes re MP property status	B130	NJS	0.20	80.00
12/11/2024	revisions to VESCO sale motion	B130	NJS	0.80	320.00
12/11/2024	draft and revise declaration in support of VESCO sale/employment motion	B130	NJS	1.10	440.00
12/11/2024	Finalize notice of destruction, communication with Trustee re: same	B130	BWA	0.30	150.00

12/11/2024	revisions to Abandonment Order to cure informal objection of GOM Shelf and multiple related communications with J. Ormiston (2.9); revisions to motion re NRW production proceeds and related communications with W. Robbins (2.7); communication with B. Barriere and M. Warner re D&O discussion (.1); communication with accountants re BOLO software for accounting production (.3).	B130	PDS	6.00	3,600.00
12/11/2024	Emails and Tc's with IT folks and various parties regarding document access; analysis of subsidiary access issues	B210	WSR	0.90	540.00
12/11/2024	Revise motion for escrow, bonding deadline.	B130	JDC	3.00	1,500.00
12/11/2024	Redline proposed records order (1.0); Communication with IT re: electronic data login, communication with EP counsel re: same (.90); Telephone conference and email communication with J. Bailey re: records motion, analysis of same (.80); Analysis of Shell's questions re: abandonment motion exhibit (.40)	B130	BWA	3.10	1,550.00
12/11/2024	Continued conducting research on issues under § 554	B130	AWM	3.20	1,280.00
12/11/2024	Meeting with D.Stewart re Trustee's Motion to Abandon Exhibit 1	B130	AWM	0.10	40.00
12/11/2024	Updating Exhibit 1 for Trustee's Amended Motion to Abandon	B130	AWM	0.60	240.00
12/11/2024	Finalized draft email response to Shell's counsel re abandonment	B130	AWM	0.70	280.00
12/11/2024	W&T multiple emails and tc's with Mr. Lackey (.8); Analysis of Interior Admin Claim, damages and remedies (3.5); Revising escrow motion (1.8)	B130	WSR	6.10	3,660.00
12/12/2024	Analysis of litigation strategy re NRW sale and multiple related communications with M. Warner and W. Robbins (3.4); revisions to proposed abandonment order and related communications with J. Cerise and Interior (1.6); revisions to CONA relating to Abandonment Order (.7); communication with Interior re NRW Sale (.6).	B130	PDS	6.30	3,780.00
12/12/2024	continue revising VESCO declaration for sale motion	B130	NJS	0.50	200.00
12/12/2024	continue drafting/revising VESCO sale motion	B130	NJS	1.00	400.00
12/12/2024	Revise destruction notice, communication with Trustee re: same (.90); Telephone conference and email communication with B. Knapp and R. Kuebel re: records motion concerns (.90); Review, preliminary analysis of proposed edits to records motion order from GOM Shelf and Kuebel/Knapp, communication with Trustee re: same (1.70); Attention to abandonment motion exhibit contents (.10)	B130	BWA	3.60	1,800.00
12/12/2024	Communications with R. Dykes re: NRW discovery requests, draft discovery requests, review Debtor documents (1); revise motion for escrow, bonding deadline (.5); research issues raised in Interior's request for payment of administrative expenses (.5).	B130	JDC	2.00	1,000.00

12/12/2024	Review revised records motion from Mr. Knapp (.3); emails to/from GI Realtor (.3); Emails to/from W&T Counsel regarding PSA and deposit (.2); review and analyze Vesco purchase issues (.4); Tc with Trustee regarding GI property and emails to/from prospective purchaser and realtors (.9); Analysis of NRW issues and tc with Trustee regarding same (1.3); Tc with Mr. Kuebel and Knapp regarding records issues and review revised Records order (.8)	B130	WSR	3.90	2,340.00
12/12/2024	Analysis of NRW issues and next steps	B130	BWA	1.20	600.00
12/12/2024	Review/analyze GOM Shelf's proposed redlines to NDA (.50); Correspondence from H. James (EP) re: electronic access (.10)	B130	BWA	0.60	300.00
12/13/2024	Finalize SRBA and TPS-West October Monthly Fee Statements	B160	KAH	0.30	90.00
12/13/2024	Emails and telephone calls with Plaquemines Parish Clerk of Court re mortgage certificate	B130	KAH	0.30	90.00
12/13/2024	Zoom call with Fishman Team and M. Warner re (a) Hedron issues and (b) D&O assignments (.6); receipt and preliminary review of Array complaint and related communications with M. Warner, A. Greenbaum, and W. Robbins (3.0); revisions to certificate of agreed order, proposed order, and amended exhibit and related settlement communications with J. Ormiston and R. Lamb (2.2); communication with M. Warner re abandonment motion and NRW pleadings (.3);	B130	PDS	6.10	3,660.00
12/13/2024	Draft/revise MFS's for SRBA and TPS-West for Oct 2024.	B160	PDS	1.20	720.00
12/13/2024	Revise motion for escrow, bonding deadline (1); begin preparing formal document requests, subpoenas to Spectrum, Nautilus (1).	B130	JDC	2.00	1,000.00
12/13/2024	Review and revise turnover demand to Chase re: account arguably subject to Devon trust agreement	B130	BAB	1.00	600.00
12/13/2024	Finalize for filing Certificate of Counsel and Orders re MT Abandon	B130	KAH	0.20	60.00
12/13/2024	Reviewing Debtors' motion to relinquish and comparing it to Trustee's Motion to Abandon Exhibit 1	B130	AWM	1.30	520.00
12/13/2024	Zoom meeting with the D.Stewart, W.Robbins, the Trustee and Fishman Haygood re Hedron settlement	B130	AWM	0.90	360.00
12/13/2024	Responding to discovery requests for NRW motion	B130	AWM	0.70	280.00
12/13/2024	Drafting Exhibit A to Subpoenas for document production to Spectrum GOM and Nautilus LLC re NRW	B130	AWM	2.60	1,040.00
12/13/2024	Updating Exhibit 1 for Trustee's Amended Motion to Abandon	B130	AWM	0.80	320.00



12/13/2024	review order on Array TRO suit and tc with counsel (.4); Conference regarding D&O / release issues (.5); Attention to Plaquemines liens (.4); Review and analysis of Array / NRW TRO complaint; tc with Trustee; tc with counsel for Array (1.5); Emails to/from Mr. Dykes regarding TSA, DOO, Agency and other NRW issues and analysis regarding same (.8); Analysis of GI property issues and email to potential purchaser (.4); Attention to subpoena and other NRW issues (.6); Emails and analysis regarding Records motion and order issues (.8); Review JP Morgan / Chase Bank account issues and drafting Turnover letter (1.2)	B130	WSR	6.60	3,960.00
12/13/2024	Telephone conference and email communication with B. Knapp re: records motion order, communication with Trustee re: same (1.0); Communication with J. Ormiston re: GOM Shelf redlines, communication with Trustee (.40); Re-calendar objection deadlines for informal extensions to records motion (.10)	B130	BWA	1.50	750.00
12/13/2024	Telephone conference and email communication with H. James re: electronic records access, analysis of same and communication with IT re: same	B130	BWA	0.70	350.00
12/14/2024	Draft/revise motion relating to NRW abandonment and relinquish	B130	PDS	4.00	2,400.00
12/15/2024	Revise formal document requests to Spectrum, Nautilus.	B130	JDC	1.00	500.00
12/16/2024	Zoom call with W. Robbins and M. Warner re NRW sale issues and Array complaint and TRO (.7); analysis of strategy relating to NRW issues and draft/revise related motions (5.8) and related communications with M. Warner (.5), E. Poitevent (.3), R. Lamb (.2); R. Kuebel (.2); B. Kadden (.1); and A. Power (.3).	B130	PDS	8.00	4,800.00
12/16/2024	phone call with S. Selheimer (AXIP) re activity at various properties	B130	NJS	0.30	120.00
12/16/2024	Review/analyze W&T sale motion to determine status of properties inquired about by AXIP	B130	NJS	0.20	80.00
12/16/2024	Update December payables	B210	KAH	0.10	30.00
12/16/2024	Communication with Trustee re: equipment destruction notice and records motion order, analysis of same (.90); Communication with B. Knapp and J. Ormiston re: records motion proposed order redlines, analysis of same (.90); Analysis of abandonment motion exhibit (.40)	B130	BWA	2.20	1,100.00
12/16/2024	Communication with IT and EP counsel re: electronic records access	B110	BWA	1.10	550.00
12/16/2024	Revise formal document requests to Spectrum, Nautilus (1.2); review Debtor documents (2.2).	B130	JDC	3.40	1,700.00
12/16/2024	Analysis of nrw issues (3.5); tc with trustee regarding same (.5); Telephone conference with counsel for Array (.3); receive / review mortgage report from plaquemines parish (.5); Telephone conference with trustee regarding same (.2); emails to/from w&t (.3)	B130	WSR	5.50	3,300.00
12/16/2024	Review mortgage certificates from Plaquemines Parish re Cox and Energy XXI	B130	KAH	0.30	90.00

12/16/2024	Attention to upload of documents re NRW discovery requests.	B130	KAH	0.40	120.00
12/16/2024	Draft subpoena to Spectrum	B130	KAH	0.30	90.00
12/16/2024	Analysis and drafting related to discovery requests to NRW related parties	B130	AWM	1.40	560.00
12/16/2024	Drafting Email to B. Kadden requesting for waiver of service of the subpoenas to Nautilus LLC and Spectrum GOM;	B130	AWM	0.50	200.00
12/17/2024	Update December payables.	B210	KAH	0.10	30.00
12/17/2024	call with M. Warner re NRW and Array issues and Trustee's strategy (1.8); communication with R. Lamb re similar issues (.3); analysis of strategy re NRW breaches of sale obligations and draft/revise pleadings for Trustee review (5.3); and related communications with M. Warner (.3) and (.4); communication with NRW, R. Lamb, and M. Warner re NRW settlement overtures, regulatory compliance (1.9).	B130	PDS	10.00	6,000.00
12/17/2024	Review NRW's 3 sets of discovery responses, draft discovery deficiency letter(1); review Debtor documents (6.1).	B130	JDC	7.10	3,550.00
12/17/2024	Review and analyze Array and NRW issues (1.5); Tc's with Mr. Dykes regarding same (.4); review NRW emails and claims regarding regulatory issues (.7); emails to/from W&T and analysis of lien issues (.5)	B130	WSR	3.10	1,860.00
12/17/2024	Running a compare on the Trustee's Motion to Abandon Documents and Data	B130	AWM	0.20	80.00
12/17/2024	Drafting Certificate of No Objection to Trustee's Motion to Abandon Documents and Data	B130	AWM	1.20	480.00
12/17/2024	Compiling all documents listed in NRW's discovery responses re: Second Motion to Amend; Uploaded the document to ShareFile and sent to K.Heard to upload to Everlaw.	B130	AWM	0.90	360.00
12/17/2024	Reviewing Trustee's Motion to Abandon Documents and Data to ensure all proposed redlines are included and no other changes had been made	B130	AWM	1.10	440.00
12/17/2024	Attention to document organization re: NRW discovery responses	B130	KAH	0.30	90.00
12/17/2024	Communication with GOM Shelf counsel re: NDA redlines, review and analyze same	B130	BWA	1.30	650.00
12/17/2024	Communication with B. Knapp re: edits to proposed records motion order (.20); Review/revise Certificate of No Objection for records motion, communication with associate regarding same, and attention to redline/clean proposed order	B130	BWA	2.20	1,100.00
12/17/2024	Review and analyze GOM Shelf modifications regarding Records order and NDA	B130	WSR	0.50	300.00
12/18/2024	continue drafting/revising MT sell venice	B130	NJS	1.10	440.00
12/18/2024	phone call from S. Selheimer (AXIP) re status of various pieces of property	B130	NJS	0.10	40.00



12/18/2024	Analysis of Array and NRW TRO pleadings, document production from Array, and other evidence in drafting and revising NRW-related pleadings (9.3), and related communication with M. Warner (1.0), A. Greenbaum (4), L. Phillips (.6), J. Ormiston (.3); and R. Kuebel (.3), all related hands meeting with W. Robbins, B. Brown, N. Smeltz, B. Altazan, and A. Mock (1.1).	B130	PDS	13.00	7,800.00
12/18/2024	Analysis of Interior administrative expense claim and related communications with M. Warner and B. Brown (.8); Attention to Order Authorizing Abandonment, Rejection, and Compromise and related communications with B. Altazan and A. Mock (.9); analysis of Array TRO and related NRW issues and related communications with M. Warner and W. Robbins (1.9); communication with R. Lamb re various Interior issues (.4).	B130	PDS	4.00	2,400.00
12/18/2024	multiple communications with R. Lamb and E. Poitevent re NRW issues (.8); continued revisions to TRO pleadings and related complaint (10.3), and related communications with R. Kuebel (.4), A. Greenbaum (.1), E. Poitevent (.1), L. Phillips (.2), and M. Warner (.6).	B130	PDS	12.40	7,440.00
12/18/2024	Finalize, as to records motion, proposed order redlines and CONO, oversee filing of same, communication with chambers re: same	B130	BWA	1.30	650.00
12/18/2024	Prepare responses to NRW's 3 sets of discovery requests (2.8); research and analyze Interior's admin claim (2.5); review Debtor documents (1); update status on discovery relative to NRW litigation (.5).	B130	JDC	6.80	3,400.00
12/18/2024	analysis off TRO and injunctive issues and materials recently filed in Array TRO proceeding (1.9) and related communications with Array and A. Greenbaum (1.1) and (.3); M. Warner (.4); R. Lamb (.2); M. Warner (.2); A. Greenbaum (.2); E. Poitevent (.3); and R. Kuebel (.4).	B130	PDS	5.00	3,000.00
12/18/2024	analyze strategy for response to US royalty admin expense claim app	B310	BAB	1.60	960.00
12/18/2024	Emails with M. Borrer, client re: expense withholding from 401k fund for winddown expenses, analyze information provided by M. Borrer	B220	BAB	0.40	240.00
12/18/2024	Further revisions to Chase turnover demand re: Devon funds	B130	BAB	0.30	180.00
12/18/2024	Finalize CONO and Orders re MT Abandon Records	B130	KAH	0.20	60.00
12/18/2024	internal meeting with D. Stewart, W. Robbins, B. Brown, B. Altazan, and A. Mock to discuss issues concerning NRW transaction and strategies for moving forward	B130	NJS	1.30	520.00
12/18/2024	preliminary review of Array preliminary injunction pleadings	B130	NJS	0.60	240.00
12/18/2024	All-hands meeting re: NRW issues/pleadings and analyze next steps	B130	BWA	1.80	900.00
12/18/2024	Analyze proposed redlines to NDA from GOM Shelf, communication with their counsel re: same	B130	BWA	0.50	250.00

12/18/2024	Tc with W&T in house counsel regarding sale issues (.4); review and forward Mortgage Certificate to Mr. Dykes and emails to/from same regarding work sites of lien claimants (.3); analysis of lien claim issues (.6); Review NRW and Array pleadings (.6); Meeting regarding TRO and other NRW / Array issues and analysis of remedies and causes of action (2.3); drafting Breach of Contract complaint (4.5); Emails regarding records issues (.3); Emails regarding No Objection requests (.3)	B130	WSR	9.20	5,520.00
12/18/2024	Completed pre-production review of documents responsive to NRW requests	B130	AWM	0.80	320.00
12/18/2024	Meeting with D. Stewart, B. Altazan, W. Robbins, N. Smeltz, and B. Brown to discuss Trustee's options re United States' Application for Admin Expense Claim	B310	AWM	1.30	520.00
12/18/2024	Began drafting Trustee's Objection to the United States' Application for Admin Expense Claim	B310	AWM	2.10	840.00
12/18/2024	Analyze issues with Array v NRW suit, impact on estate due to non-payment of Array, royalties, vendors, strategy moving forward to deal with properties	B130	BAB	2.30	1,380.00
12/19/2024	Finalize Notice of Destruction for filing.	B210	KAH	0.20	60.00
12/19/2024	Review/revise Complaint against NRW	B190	BWA	1.80	900.00
12/19/2024	Review order granting records motion, calendar pertinent deadlines, communication with Trustee re: same (.40); Finalize Notice of Destruction for abandoned equipment, oversee filing of same (.40); Implement abandonment order, including calendaring of pertinent deadlines and drafting of pertinent pleadings (3.30)	B130	BWA	4.10	2,050.00
12/19/2024	Emails to/from W&T regarding purchase issues (.3); emails regarding GI offer and tc with Trustee regarding same (.4); email regarding GI 18 abstract (.2); review / revise proposed TRO and analysis of issues relating to same, including applicable PSA provisions (2.3); review and analyze survival provisions in PSA (.7); analysis of sale true up provisions in PSA (1.0); continued drafting and revising of PSA (3.3)	B130	WSR	8.20	4,920.00
12/19/2024	Analyze basis for objection to US royalty admin exp app, defenses for same	B310	BAB	1.20	720.00
12/19/2024	Emails and telephone conference with client re: winddown expenses for 401k plan, emails with M. Borrer re: same	B220	BAB	0.40	240.00
12/19/2024	Review and revise initial draft of objection to US royalty admin claim (1.6); research re: admin exp requirements and application to offshore fed leases (1.9)	B310	BAB	3.50	2,100.00
12/19/2024	draft and revise certificate of no objection to SRBA first interim fee application	B160	NJS	0.30	120.00
12/19/2024	Correspondence from GOM Shelf counsel re: NDA redlines	B130	BWA	0.10	50.00
12/19/2024	Research and draft objection to US admin expense claim	B310	JDC	5.60	2,800.00
12/19/2024	Conducting research on MSJ and declaratory judgments re NRW	B130	AWM	2.30	920.00
12/19/2024	Drafting research memo on MSJ and declaratory judgments re NRW	B130	AWM	2.60	1,040.00

12/19/2024	Conducting research on administrative expense claims for unpaid royalties	B310	AWM	3.40	1,360.00
12/19/2024	Emails with Department of Interior re the Trustee's compromise with Interior	B130	AWM	0.40	160.00
12/19/2024	Research re NRW claim for adverse pleading	B130	AWM	2.60	1,040.00
12/19/2024	Review and analyze memo on declaratory judgment issues re: royalty responsibility, analyze cases cited and strategy moving forward	B310	BAB	1.80	1,080.00
12/19/2024	continue revising MT sell Venice property	B130	NJS	2.30	920.00
12/19/2024	Draft responses to NRW discovery requests	B130	JDC	3.20	1,600.00
12/20/2024	Implementation of abandonment order	B130	BWA	0.80	400.00
12/20/2024	Telephone conference with M. Borrer re: winddown expenses (0.3); email to client re: same (0.1)	B220	BAB	0.40	240.00
12/20/2024	Review and revise latest draft of objection to US royalty admin claim	B310	BAB	3.10	1,860.00
12/20/2024	Analyze whether MSJ would be appropriate in US royalty admin contested matter, analyze issues relating to MSJ on same	B310	BAB	1.30	780.00
12/20/2024	formatting orders for SRBA first interim fee application and certificate of no objection	B160	NJS	0.40	160.00
12/20/2024	draft and revise certificate of no objection for Trustee first interim fee application	B160	NJS	0.20	80.00
12/20/2024	Analysis of EIG lien and potential claims to proceeds	B130	NJS	1.00	400.00
12/20/2024	further revisions to WT sale motion	B130	NJS	1.40	560.00
12/20/2024	Attention to questions on ap cover sheet to be answered during filing; prepare summons	B130	KAH	0.50	150.00
12/20/2024	Research and draft objection to US admin expense claim (3.5); research and draft memo in support of MSJ v. US (5.0)	B310	JDC	8.50	4,250.00
12/20/2024	Continued analysis of NRW / Array issues and multiple emails regarding same; review TRO related pleadings (1.8); Review of Devon / Trust account issues and tc with JP Morgan / Chase regarding same (.5); Conference with W&T regarding sale status (.3); tc with LOG counsel regarding ROW reinstatement and follow up tc and email with W&T regarding same (.6); revising W&T Motion to Sell and emails regarding same (1.3); review / revise VESCO Motion and forward same (.9)	B130	WSR	5.10	3,060.00
12/20/2024	Memo research and drafting related to US Admin Claim	B310	AWM	0.80	320.00
12/20/2024	circulating certificate of no objection and proposed orders to trustee	B130	NJS	0.20	80.00
12/21/2024	Review and revise MIS of MSJ as to US royalty claim	B310	BAB	2.40	1,440.00
12/21/2024	Research and draft memo in support of MSJ v. US	B310	JDC	1.30	650.00
12/23/2024	Review correspondence to NRW regarding discovery issues (.3); multiple emails to/from W&T regarding pipeline and ROW issues (.8); email to proposed GI property purchaser (.1)	B130	WSR	1.20	720.00

12/23/2024	multiple communications with A. Greenbaum and M. Warner re Array issues (.6); review of, and comments and revisions to, discovery responses due NRW (.5); research assignment to A. Mick re NRW-Array situation (.4).	B130	PDS	1.50	900.00
12/23/2024	receipt and preliminary review of Miller litigation subpoena and related communications with M. Warner and team.	B190	PDS	0.30	180.00
12/23/2024	Further revisions to latest draft of MIS of MSJ on royalty claim by US	B310	BAB	1.40	840.00
12/23/2024	Analyze issues of whether estates are liable for non-payment of Array and subcontractors	B310	BAB	0.90	540.00
12/23/2024	Draft responses to NRW's discovery requests	B130	JDC	0.40	200.00
12/23/2024	Research re administrative expense claims against the Estate of subcontractors	B130	AWM	6.70	2,680.00
12/23/2024	Draft memo in support of MSJ	B310	JDC	3.00	1,500.00
12/24/2024	Research on the possibility of administrative expense claims against the Estate by subcontractors	B130	AWM	1.10	440.00
12/26/2024	Review nondebtor subsidiary issues; emails related to same	B130	WSR	0.50	300.00
12/26/2024	review and forward email regarding corporate deposition and other discover issues from state court action	B310	WSR	0.40	240.00
12/26/2024	receipt and preliminary review of opposition to admin claim and related communications with B. Brown and J. Cangelosi.	B310	PDS	1.20	720.00
12/26/2024	Further revisions to MIS of MSJ on US royalty claim	B310	BAB	2.70	1,620.00
12/26/2024	Research re administrative expense claim of subcontractors	B130	AWM	2.40	960.00
12/26/2024	Attention to discovery and deposition notices	B130	BWA	0.50	250.00
12/27/2024	emails regarding Devon Bond / account	B130	WSR	0.10	60.00
12/27/2024	Further revisions to opposition to Interior admin claim and related communications with M. Warner.	B310	PDS	2.30	1,380.00
12/27/2024	Draft/revise MT Relinquish and Abandon NRW assets and related communications with W. Robbins and M. Warner.	B130	PDS	3.40	2,040.00
12/27/2024	Finalize Objection to Admin Expense Claim of US.	B190	KAH	0.20	60.00
12/27/2024	Review research on whether discovery is stayed against chapter 7 estate even if stay lifted to allow matter to move forward against chapter 11 debtors, analyze strategy moving forward	B190	BAB	1.50	900.00
12/27/2024	Review and analyze NRW objection to US royalty admin app	B310	BAB	0.80	480.00
12/27/2024	emails and analysis regarding state court discovery issues	B190	WSR	0.50	300.00
12/27/2024	review of, and comments and revisions to, opposition to Interior Admin Claim and related communications with B. Brown, J. Cangelosi, and M. Warner	B310	PDS	3.50	2,100.00
12/27/2024	Research re administrative expense claim of subcontractors	B130	AWM	5.40	2,160.00
12/27/2024	Drafting research memo on potential subcontractors administrative expense claim	B130	AWM	4.10	1,640.00

12/27/2024	Reviewing Trustee's Objection to United States' Application for Admin Expense Claim	B310	AWM	1.40	560.00
12/27/2024	Review and revise objection to US administrative expense claim.	B310	JDC	2.10	1,050.00
12/27/2024	Research and analysis of whether the automatic stay precludes propounding discovery and taking corporate rep deposition	B240	NJS	2.70	1,080.00
12/27/2024	Analysis of discovery requests to Trustee pertaining to claims against insurers	B190	PDS	0.50	300.00
12/27/2024	Telephone conference with Mr. Dykes regarding Array Shut In (.3); Telephone conference with Trustee (.3); Telephone conference with Array counsel (.3); analysis of issues arising from same (.3)	B130	WSR	1.20	720.00
12/28/2024	Review and analyze research memo re: whether Array and others potentially have claims against the estates for unpaid work on federal leases to which estates retain legal title	B310	BAB	1.60	960.00
12/28/2024	Drafting research memo on potential subcontractors administrative expense claim	B310	AWM	3.80	1,520.00
12/29/2024	Draft/revise MT Relinquish and Abandon and related communications with M. Warner.	B130	PDS	4.90	2,940.00
12/30/2024	Attention to December payables; review of invoices; update spreadsheet; emails to PDS.	B210	KAH	0.70	210.00
12/30/2024	Attention to draft emergency motion to relinquish and abandon	B130	BWA	0.40	200.00
12/30/2024	Attention to discovery dispute	B190	BWA	0.20	100.00
12/30/2024	Finalize December payables; emails to/from R. Dykes and D. Stewart re: same.	B210	KAH	0.30	90.00
12/30/2024	emails and tc's regarding NRW / Array transaction and related issues (1.8); review/ revise proposed Motion to Relinquish / Abandon (2.3)	B130	WSR	4.10	2,460.00
12/30/2024	review of, and comments and revisions to, MT Relinquish and Abandon and multiple related communications with team and Trustee.	B130	PDS	3.70	2,220.00
12/30/2024	Revise objection to US administrative expense claim.	B130	JDC	4.70	2,350.00
12/30/2024	draft and revise correspondence to Nicholas Miller re 30(b)(6) deposition	B190	NJS	2.60	1,040.00
12/30/2024	Review and revise letter to Miller counsel re: corporate deposition issues	B190	BAB	1.10	660.00
12/30/2024	Revise and revise Trustee's Emergency Motion to Relinquish and Abandon	B130	AWM	6.00	2,400.00
12/30/2024	Analyze issues arising from purported purchase of Array by NRW, affect on abandonment and other estate issues	B130	BAB	1.40	840.00
12/30/2024	Review and revise motion to relinquish and abandon	B130	BAB	2.20	1,320.00
12/31/2024	additional review and revision to Motion to Relinquish / Abandon	B130	WSR	1.40	840.00
12/31/2024	Review and revise latest drafts of motion to abandon, order on same	B130	BAB	2.60	1,560.00



Total	534.70	\$280,080.00
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FEE EARNER SUMMARY

Fee Earner	Hours	Effective Rate	Amount
PDS Paul Douglas Stewart, Jr.	122.10	600.00	73,260.00
WSR William S. Robbins	105.00	600.00	63,000.00
AWM Abigail W. Mock	99.50	400.00	39,800.00
BAB Brandon A. Brown	45.50	600.00	27,300.00
BWA Brooke W. Altazan	52.40	500.00	26,200.00
JDC Jamie D. Cangelosi	73.30	500.00	36,650.00
KAH Kimberly A. Heard	8.90	300.00	2,670.00
NJS Nicholas J. Smeltz	28.00	400.00	11,200.00

TASK SUMMARY

Task	Hours	Effective Rate	Amount
B110 Case Administration	1.10	500.00	550.00
B130 Asset Disposition	422.80	528.78	223,570.00
B140 Relief from Stay/Adequate Protection Proceedings	3.50	582.86	2,040.00
B160 Fee/Employment Applications	7.00	454.29	3,180.00
B190 Other Contested Matters(excluding assumptions/reje	13.80	506.52	6,990.00
B210 Business Operations	6.00	426.67	2,560.00
B220 Employee Benefits/Pensions	3.10	600.00	1,860.00
B240 Tax Issues	2.70	400.00	1,080.00
B310 Claims Administration and Objections	74.70	512.05	38,250.00

DISBURSEMENTS

Date	Description	Amount
12/2/2024	UCC Search re: EPL Oil & Gas LLC in Delaware	134.00
12/2/2024	UCC Search re: EPL Oil & Gas LLC in Delaware	84.00
12/2/2024	Service by BK ATTORNEY SERVICES, LLC d/b/a CertificateofService.com	1,019.49
12/2/2024	Service by BK ATTORNEY SERVICES, LLC d/b/a CertificateofService.com	523.64
12/4/2024	Cost of mortgage certificates	349.00
12/5/2024	UCC Search re: EPL Oil & Gas LLC in Delaware	589.00
12/5/2024	UCC Search re: EPL Oil & Gas LLC in Texas	41.00
12/17/2024	Texas Secretary of State database fees for entity inquiries	4.00
12/31/2024	Everlaw for December 2024	26.75
12/31/2024	Copies for December 2024	171.60
Total DISBURSEMENTS		\$2,942.48

New Charges	\$283,022.48
Previous Balance	\$921,558.90
Balance Due	\$1,204,581.38

Trust Statement

Date	Description	Disbursements	Receipts
	Balance Forward		5,000.00
2/25/2025	W&T Offshore		5,000.00
	Deposit for acquisition		
3/10/2025	W&T Offshore		240,000.00
3/11/2025	MLCJR, LLC	250,000.00	
	W&T Asset Sale Proceeds		
	Whitney Ref. No. 0617		
	Total	\$250,000.00	\$250,000.00
	Trust Balance		\$0.00



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**MLCJR LLC, *et al.*,**<sup>1</sup>

## Debtors

## Chapter 7

**Case No. 23-90324 (CML)**

## Jointly Administered

**NINTH MONTHLY STATEMENT OF SERVICES RENDERED AND EXPENSES  
INCURRED FOR THE PERIOD ENDING JANUARY 31, 2025 BY STEWART ROBBINS  
BROWN & ALTAZAN, LLC AS COUNSEL TO THE TRUSTEE**

Stewart Robbins Brown & Altazan LLC (“SRBA”), proposed counsel for Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”) for the above-captioned administratively consolidated estates (collectively, the “Estates”), hereby submits this Ninth Monthly Fee Statement for Services Rendered and Expenses Incurred (the “Monthly Fee Statement”) for the period ending January 31, 2025 (the “Statement Period”), in accordance with the Court’s *Order Granting Trustee’s Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee’s Professionals* [Docket # 1831] establishing interim compensation procedures (the “Interim Compensation Order”). In support of the Monthly Fee Statement, SRBA respectfully represents as follows:

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors' address is 4514 Cole Ave. Suite 1175, Dallas, Texas 75205.

SRBA respectfully submits this Monthly Fee Statement seeking compensation for reasonable, actual and necessary services and expenses rendered by SRBA on behalf of the Trustee during the Statement Period:

STATEMENT PERIOD SUMMARY	
Name of Applicant:	Stewart Robbins Brown & Altazan LLC
Applicant's Role in Case:	Chapter 7 Trustee's General Counsel
Date of Retention:	June 12, 2024 (Doc. 2116) retroactive to May 6, 2024
Period Covered by this Statement:	Jan 1, 2025 through Jan 31, 2025
Number Monthly Fee Statements:	Ninth
STATEMENT PERIOD SUMMARY OF FEES AND EXPENSES	
Total Statement Period Fees	\$216,810.00
Total Interim Fees (80%) Requested	\$173,448.00
Total Expenses Requested	\$4,214.56
Total Interim Remuneration Requested (exclusive of holdback):	\$177,662.56
STATEMENT PERIOD SUMMARY FOR ATTORNEYS	
Total attorney fees requested in this statement:	\$210,210.00
Total actual attorney hours covered by this statement:	386.70
Average hourly rate for attorneys:	\$500.34
STATEMENT PERIOD SUMMARY FOR PARAPROFESSIONALS	
Total paraprofessional fees requested in this statement:	\$6,600.00
Total actual paraprofessional hours covered by this statement:	22
Average hourly rate for paraprofessionals:	\$300.00

**In accordance with the *Order Granting Trustee's Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee's Professionals* [Docket no. 1831], each party receiving notice of the monthly fee statement will have until 5:00 p.m. (Prevailing Central Time), 10 days after the filing of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 10-day period, the Trustee is authorized to pay the professional the amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

1. The following chart presents certain information regarding the SRBA professionals whose work on these chapter 7 cases compensation is sought in this Monthly Fee Statement sorted by professional, along with each professionals' title, earliest bar passage (if applicable), highest rate, blended rate, total amount billed, and percentage of billings:

Professional	Title	Date Initial Bar License	Total Time	Blended Rate	Highest Rate	Total Amount Billed	Percentage Billed
Brandon A. Brown	Member	LA - 1998	28.20	\$616.67	\$650.00	\$17,365.00	8.01%
Brooke W. Altazan	Member	LA - 2009	23.20	\$517.19	\$550.00	\$11,960.00	5.52%
Kimberly A. Heard	Paralegal	N/A	22.00	\$300.00	\$300.00	\$6,600.00	3.04%
Nicholas J. Smeltz	Associate	LA - 2019	19.90	\$408.82	\$450.00	\$8,025.00	3.70%
Paul D. Stewart, Jr.	Member	LA - 1996	136.50	\$615.85	\$650.00	\$85,265.00	39.33%
William S. Robbins	Member	LA - 1996	75.30	\$589.13	\$650.00	\$46,780.00	21.58%
Abigail W. Mock	Associate	LA - 2024	49.90	\$240.00	\$400.00	\$13,040.00	6.01%
Jamie D. Cangelosi	Of Counsel	LA - 2000	53.70	\$514.71	\$550.00	\$27,775.00	12.81%
<b>Grand Total</b>			<b>408.70</b>	<b>\$480.13</b>	<b>\$650.00</b>	<b>\$216,810.00</b>	<b>100.00%</b>

2. The following chart provides a summary of fees incurred during the Statement Period sorted by ABA bankruptcy task code, along with the total time, percentage of time, total billed amount, and percentage of amount for each task:

Task	Total Time	Percent of Time	Total Amount	Percent of Amount
b110 Case Administration	1.3	0.32%	\$670.00	0.31%
b120 Asset Analysis and Recovery	0.1	0.02%	\$40.00	0.02%
b130 Asset Disposition	328.5	80.38%	\$176,715.00	81.51%
b140 Relief from Stay/Adequate Protection	1.9	0.46%	\$760.00	0.35%
b150 Meeting of and Comm with Creditors	2.5	0.61%	\$1,250.00	0.58%
b160 Fee/Employment Applications	6.6	1.61%	\$2,620.00	1.21%
b180 Avoidance Analysis	0.2	0.05%	\$130.00	0.06%
b190 Other Contested Matters	52.2	12.77%	\$25,890.00	11.94%
b210 Business Operations	2.9	0.71%	\$1,150.00	0.53%
b220 Employee Benefits/Pensions	1.9	0.46%	\$1,225.00	0.57%
b230 Financing Cash Collections	9.9	2.42%	\$5,940.00	2.74%
b310 Claims Administration and Objections	0.7	0.17%	\$420.00	0.19%
<b>Grand Total</b>	<b>408.7</b>	<b>100.00%</b>	<b>\$216,810.00</b>	<b>100.00%</b>

3. The following chart provides a summary of expenses incurred during the Statement Period sorted by category of expenses:

SUMMARY OF EXPENSES	
Expense Description	Expenses Amount
Copies	\$1,609.20
Pacer	\$125.20
Corporate Records	\$1.00
EDI Costs	\$811.96
Filing Fee	\$338.00
Work Travel	\$416.60
(blank)	\$912.60
<b>Grand Total</b>	<b>\$4,214.56</b>

4. SRBA's invoice covering the Statement Period and providing a detailed statement of both (a) hours spent rendering legal services to the Trustee and (b) disbursements made or incurred by SRBA in connection with services performed on behalf of the Trustee during the Statement Period is attached hereto as **Exhibit "A"**.

5. Pursuant to the Interim Compensation Order, SRBA seeks payment of \$177,662.56 from the Trustee for the Statement Period, representing (a) 80% of SRBA's total fees for services rendered and (b) 100% of the total expenses incurred during the Statement Period.

6. Although every effort has been made to include all fees and expenses incurred during the Statement Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Statement Period. SRBA reserves the right to seek allowance of such fees and expenses not included herein.

Dated: June 11, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN  
& ALTAZAN, LLC**

By: /s/Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
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***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**MLCJR LLC, *et al.***  
**EXHIBIT A**

**DETAILED TIME AND EXPENSE ENTRIES**  
**Time Period – January 1, 2025 – January 31, 2025**



301 Main Street, Suite 1640  
Baton Rouge, LA 70821  
225-231-9998

Michael D. Warner  
440 Louisiana Ave., Suite 900  
Houston, TX 77002  
USA

May 21, 2025

File #: 119-001  
Invoice #: 1647

**RE:** In re MLCJR LLC & M21K, LLC

DATE	DESCRIPTION	Task	LAWYER	HOURS	AMOUNT
1/1/2025	Review correspondence from T. Bevolo re: CTG payment status	B130	BAB	0.10	60.00
1/2/2025	review and analyze Devon / Chase Trust agreement and related correspondence; conference with Devon counsel regarding same; email from Chase regarding bank documents and account	B130	WSR	1.20	720.00
1/2/2025	email to/from Mr. Zimmerman regarding Array / GOM NDA	B210	WSR	0.40	240.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with Firm and client.	B130	PDS	3.10	1,860.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and SRBA Team.	B130	PDS	1.30	780.00
1/2/2025	Research, revise motion to relinquish, terminate, and abandon.	B130	JDC	0.20	100.00
1/2/2025	Revise motion to abandon naked title retained under sale to NRW (2.3); review and research cases supporting abandonment in light of Midlantic (2.6)	B130	BAB	4.90	2,940.00
1/2/2025	Prepare for and participate in telephone conference with counsel for Devon re: account possibly subject to trust agreement (0.6); analyze issues raised by Devon counsel and path moving forward (0.5)	B130	BAB	1.10	660.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner, SRBA Team, and E. Poitevent.	B130	PDS	2.20	1,320.00
1/2/2025	Correspondence from A. Carr re: document retention	B130	BWA	0.10	50.00
1/2/2025	Revising Trustee's Motion to Abandon and Relinquish	B130	AWM	3.00	600.00
1/3/2025	Receipt of R. Dykes final activity report for December; update payable spreadsheet; email to B. Dassa re same.	B210	KAH	0.20	60.00
1/3/2025	Receipt of invoices; prepare January payables spreadsheet.	B210	KAH	0.20	60.00
1/3/2025	Review orders granting SRBA fee app and Trustee fee app; update payables spreadsheet.	B160	KAH	0.20	60.00
1/3/2025	Attention to supplemental document production from A&M; download same.	B190	KAH	0.40	120.00



1/3/2025	emails and analysis regarding MT Abandon NRW interests (.5); Telephone conference with Mr. Dykes regarding NRW / Array / Vendor issues (.3)	B130	WSR	0.80	480.00
1/3/2025	Review and analyze Ryan NDA redlines (1.20); Review and analyze GOM Shelf NDA redlines (1.0)	B190	BWA	2.20	1,100.00
1/3/2025	Research, revise motion to relinquish, terminate, and abandon.	B130	JDC	3.70	1,850.00
1/3/2025	Further research re: abandonment in light of Midlantic and cases supporting same (2.7); review of and revisions to latest drafts of motion to abandon (2.6)	B130	BAB	5.30	3,180.00
1/3/2025	Analyze affect of Array purchase on abandonment motion and proof issues relating to same	B130	BAB	0.80	480.00
1/3/2025	Revising Trustee's Motion to Abandon and Relinquish t	B130	AWM	4.60	920.00
1/4/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and W. Robbins.	B130	PDS	3.10	1,860.00
1/4/2025	Correspondence from FileLink re: monthly invoice	B210	BWA	0.10	50.00
1/6/2025	Review payables specifically related to storage; emails re same.	B210	KAH	0.20	60.00
1/6/2025	Manage efforts re Miller v. Cox litigation and Trustee's response to discovery.	B190	PDS	0.10	60.00
1/6/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related Proposed Order and exhibits; and related communications with M. Warner, B. Brown, W. Robbins, and A. Mock.	B130	PDS	5.30	3,180.00
1/6/2025	revising correspondence to Nicholas Miller counsel re 30(b)(6) deposition	B190	NJS	0.20	80.00
1/6/2025	email to N. Walden and J. Morris (FBI) re asset recovery petition status	B120	NJS	0.10	40.00
1/6/2025	draft and revise certificate of no objection to TPS West first interim fee application; revise proposed order to same	B160	NJS	0.30	120.00
1/6/2025	circulating certificate of no objection to TPS West fee application, redlined and clean orders granting same to R. Anderson (TPS)	B160	NJS	0.20	80.00
1/6/2025	circulating certificate of no objection to TPS West fee application to trustee	B160	NJS	0.10	40.00
1/6/2025	Review and revise Motion to Abadon mere legal title for NRW assets (2.5); revising asset list for Motion to Abandon (1.7)	B130	WSR	4.20	2,520.00
1/6/2025	Communication with A. Carr re: abandoned equipment	B130	BWA	0.20	100.00
1/6/2025	Communication with M. Bishop (GOM Shelf) re: NDA (.20); Attention to settlement check for DOI (.30)	B190	BWA	0.50	250.00
1/6/2025	Attention to potential Hidden Assets employment	B160	BWA	0.10	50.00
1/6/2025	Analyzing documents from NRW PSA and creating exhibit for Trustee's Motion to Abandon and Relinquish	B130	AWM	3.50	700.00
1/6/2025	Revise Trustee's Motion to Abandon and Relinquish (3.0); Revise Trustee's Proposed Order (.9)	B130	AWM	3.90	780.00

1/6/2025	Follow up on third party document productions in response to subpoenas; related communications with J. Ormiston (1); review and analyze debtors' documents and emails, third party document productions (3.3); prepare for discovery conference with B. York (.2).	B130	JDC	4.50	2,250.00
1/6/2025	Review and revise latest drafts of motion to abandon legal title to NRW leases	B130	BAB	1.40	840.00
1/6/2025	Review and revise letter to counsel for N. Miller re: discovery issues	B190	BAB	0.50	300.00
1/6/2025	communication with R. Dykes re decommissioning orders	B130	PDS	0.10	60.00
1/6/2025	Attention to storage invoices	B210	BWA	0.70	350.00
1/7/2025	Finalize certificate of no objection and order granting TPS fee application.	B160	KAH	0.20	60.00
1/7/2025	Receipt of email requesting W-2; follow up emails concerning procedure for same.	B210	KAH	0.20	60.00
1/7/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related order (3.3) and related communications with M. Warner (.4).	B130	PDS	3.70	2,220.00
1/7/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner.	B130	PDS	1.30	780.00
1/7/2025	email to B. Altazan re employment application status	B160	NJS	0.20	80.00
1/7/2025	Review/analyze order approving SRBA employment	B160	NJS	0.10	40.00
1/7/2025	draft and revise notice of rate increase	B160	NJS	0.70	280.00
1/7/2025	Attention to and analysis of potentially hiring Hidden Assets	B160	BWA	0.30	150.00
1/7/2025	Analysis of and communication with GOM Shelf and Ryan re: NDA redlines	B190	BWA	1.20	600.00
1/7/2025	Analyzing A&M email production	B130	AWM	0.90	180.00
1/7/2025	Revising Trustee's Motion to Authority to Abandon and Relinquish	B130	AWM	1.80	360.00
1/7/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	3.20	1,600.00
1/7/2025	Review of latest version of letter to counsel for PI claimant re: discovery	B190	BAB	0.30	180.00
1/7/2025	Document searches re NRW per J. Cangelosi request.	B130	KAH	0.40	120.00
1/7/2025	Review Devon Bond issues (.4); review and analyze requested revisions to NDA from multiple parties (.5); review and analyze possible sale prospects and required pleadings (.8); emails and review of lien search (.5)	B130	WSR	2.20	1,320.00
1/8/2025	Attention to emails from Mimecast export and transfer to Everlaw.	B190	KAH	0.60	180.00
1/8/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and Chambers.	B130	PDS	3.40	2,040.00
1/8/2025	review of, and comments and revisions to, Notice of Abandonment and Notice of Rejection and related communications with M. Warner and W. Robbins.	B130	PDS	0.90	540.00

1/8/2025	Draft/revise 1.8.2025 Notice of Abandonment and related exhibit and related communications with W. Robbins, A. Mick, and M. Warner.	B130	PDS	1.30	780.00
1/8/2025	multiple communications with Team and opposing attorneys re subpoena.	B190	PDS	0.60	360.00
1/8/2025	communication with Opportune re subpoenas.	B190	PDS	0.40	240.00
1/8/2025	circulating proposed correspondence to Miller counsel re corporate deposition and recommendation re same	B190	NJS	0.70	280.00
1/8/2025	draft and revise motion to quash and motion for protective order from deposition notice	B190	NJS	2.90	1,160.00
1/8/2025	discussions with B. Brown re deposition notice and motion to quash issues	B190	NJS	0.20	80.00
1/8/2025	phone call with M. Warner and B. Brown re corporate deposition notice and motion to quash issues	B190	NJS	0.20	80.00
1/8/2025	email to C. Sonnier re corporate deposition notice issues	B190	NJS	0.10	40.00
1/8/2025	phone call with C. Sonnier re corporate deposition notice issues	B190	NJS	0.10	40.00
1/8/2025	circulating correspondence to N. Blanda (Nicholas Miller) re corporate deposition notice	B190	NJS	0.10	40.00
1/8/2025	Communication with Veritrust re: equipment destruction	B130	BWA	0.10	50.00
1/8/2025	Tc with Trustee regarding pending issues (.3); review / revise Notice of Abandonment (1.8); review various NDA issues (.5); review various oil and gas interests for abandonment (.9)	B130	WSR	3.50	2,100.00
1/8/2025	Analyzing A&M email production	B130	AWM	4.60	920.00
1/8/2025	Executing list of all state leases for abandonment motion (2.0); Updating ROWs/RUEs/Wells spreadsheet with the leases abandoned on 1.8.25 (.4)	B130	AWM	2.40	480.00
1/8/2025	Communications with client re: discovery letter, possible involvement of bankruptcy court (0.5); analyze need for bankruptcy court involvement and avenues for same (0.6)	B190	BAB	1.10	660.00
1/8/2025	Emails with M. Borrer re: holdback issues	B220	BAB	0.20	120.00
1/8/2025	Communications with N. Blanda re: deposition issues	B190	BAB	0.30	180.00
1/8/2025	Receipt and review of OG TPS west fee app	B160	BAB	0.10	60.00
1/8/2025	Attention to GOM NDA issues, communication with counsel and Trustee re: same (.80); Attention to Ryan NDA issues, communication with counsel re: same (.40)	B150	BWA	2.50	1,250.00
1/8/2025	Attention to Dallas office documents	B130	BWA	0.30	150.00
1/8/2025	Review and analyze debtors' documents and emails, third party document productions (4.3), related communications with E. Iannoti re: Moelis document production (.3), B. York re: NRW discovery responses, production (.4)	B130	JDC	5.30	2,650.00
1/8/2025	Attention to emergency motion issues and logistics	B130	BWA	1.30	650.00
1/9/2025	Prepare Notice of Hearing for MT Relinquish and Abandon	B190	KAH	0.30	90.00
1/9/2025	Finalize Notice of Rate Increase; emails related to same.	B160	KAH	0.20	60.00

1/9/2025	communication with interested parties re MT Relinquish and Abandon (.1); communication with B. Kadden re NRW assets (.1); communication with R. Shaddock and A. Greenbaum re MT Relinquish and Abandon (.5); communication with R. Kuebel re MT Relinquish and Abandon (.5) prepare for upcoming hearing on relinquishment and abandonment (2.5).	B130	PDS	3.70	2,220.00
1/9/2025	Prepare for and attend conference call re turnover and 2004 issues with M. Warner and K. Elmer.	B190	PDS	1.10	660.00
1/9/2025	draft and revise motion for clarification of stipulation providing Miller relief from the automatic stay	B140	NJS	1.90	760.00
1/9/2025	directions to paralegal re filing and serving notice of rate increase	B160	NJS	0.20	80.00
1/9/2025	Draft Notice of Abandonment	B130	AWM	0.30	60.00
1/9/2025	Communication with special purpose counsel and Trustee re: Dallas office/documents (.50); Communication with GOM counsel re: NDA, analysis of same (.40)	B110	BWA	0.90	450.00
1/9/2025	review and analysis of NRW / Abandonment pleadings and issues	B130	WSR	1.50	900.00
1/9/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	1.60	800.00
1/10/2025	communication with A. Mock, R. Dykes, and M. Warner re next notice of abandonment (.1); communication with L. Phillips (.2), W. Robbins (.4) and M. Warner (.3) re carve-out with Lenders; communication with R. Kuebel re predecessor interest in NRW assets (1.2); .	B130	PDS	2.20	1,320.00
1/10/2025	communication with B. Barriere and M. Warner re Underwriters' waiver of subrogation to Lenders.	B190	PDS	0.40	240.00
1/10/2025	continue drafting/revising motion for clarification of miller stipulation	B190	NJS	2.20	880.00
1/10/2025	Attention to carve out issues (1.5); attention to asset / purchase issues (.4); emails to/from W&T (.3); review various reports from Mr. Dykes (.5); emails to/from Trustee (.3); email to DIP Lender counsel regarding AFE request (.3)	B130	WSR	3.30	1,980.00
1/10/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	2.10	1,050.00
1/13/2025	Receipt of invoices and activity reports for January payables; update spreadsheet.	B160	KAH	0.30	90.00
1/13/2025	Analysis of MP72 and 73 to respond to AXIP inquiries	B130	NJS	1.10	440.00
1/13/2025	communication with M. Warner re NRW ownership issues and analysis of same (1.4); communication with R. Dykes re relinquishment and abandonment motion (.2); communication with B. Kadden re relinquishment and abandonment motion (.3); communication with M. Bishop re same (.1); communication with Interior re same (.1);	B130	PDS	1.80	1,080.00
1/13/2025	Correspondence from Kroll re: destruction of physical files	B130	BWA	0.10	50.00
1/13/2025	Review and analyze abandonment and NRW issues (.8); emails regarding asset issues (.3); emails to/from Mr. Dyles (.3); emails to/from W&T Counsel (.2)	B130	WSR	1.60	960.00

1/13/2025	Emails with M. Borrer re: holdback processing status, needs moving forward	B130	BAB	0.30	180.00
1/13/2025	Analyzing A&M email production re NRW.	B130	AWM	2.90	580.00
1/13/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	4.20	2,100.00
1/14/2025	Preparation for hearing on MT relinquish and abandon (3.0) and related communications with M. Warner (.2), Interior (.6) and R. Dykes (.5); analysis of discovery issues relating to MT relinquish and abandon and related communications with litigation team (1.7); communication with A. Mendez re settlement of MT relinquish and abandon (.2).	B130	PDS	6.20	3,720.00
1/14/2025	continue drafting/revising motion to clarify stipulation with N. Miller modifying automatic stay	B190	NJS	3.70	1,480.00
1/14/2025	Review/analyze W&T sale order to determine disposition of assets inquired about by AXIP	B130	NJS	0.50	200.00
1/14/2025	Analysis of Kroll's email re: destruction of physical files	B130	BWA	0.90	450.00
1/14/2025	Communications with R. Dykes re Notice of Abandonment	B130	AWM	0.20	40.00
1/14/2025	Conducting Secretary of State business search on opposing party	B130	AWM	0.30	60.00
1/14/2025	Draft witness and exhibit list for Trustee's emergency motion to relinquish and abandon, research and analyze evidentiary issues.	B130	JDC	5.40	2,700.00
1/14/2025	Communications with N. Blanda re: letter on 30b6 deposition notice	B190	BAB	0.30	180.00
1/14/2025	Review information/claims data provided by Kroll in anticipation of their destruction of documents.	B130	KAH	0.20	60.00
1/14/2025	Prepare subpoena to NRW; telephone calls with process servers re service of same.	B130	KAH	0.60	180.00
1/14/2025	Review relinquish/abandon motion for exhibits for hearing; pull exhibits.	B130	KAH	0.40	120.00
1/14/2025	Pull additional documents as possible exhibits for hearing on abandonment motion.	B130	KAH	0.70	210.00
1/14/2025	Conducting research re NRW motion	B130	AWM	0.40	80.00
1/14/2025	Communication with Mr. Dykes regarding NRW and other issues (.4); emails and review of materials from W&T (.8); forward lien search information (.2); teleconference with W&T regarding purchase (.3); analysis of NRW assets without burdens (.5); follow up teleconference with Mr. Dykes (.2); analysis of asset sale issues and email to trustee regarding same (2.2); response to VESCO attorney (.2); review JPMorgan/Chase response to turnover (.5)	B130	WSR	5.80	3,480.00



1/15/2025	Teams call with J. Ormiston, M. Bishop and W. Robbins re GOM Shelf opposition to relinquishment and abandonment and related communications with M. Warner (1.3); preparation for and attendance on call with NRW and counsel re potential settlement options and plan moving forward (2.1); communication with L. Phillips, M. Warner, and M. Jones re Highlander Energy XXI deal (.8); call with R. Kuebel re predecessors' issues relating to relinquishment (.5).	B130	PDS	5.70	3,420.00
1/15/2025	conference with GOM Shelf counsel regarding emergency motion (.5); analysis of related issues (.7); tc with Matt Jones and review of proposed agreement (.5); analysis of carveout issues(.3); conference with NRW counsel and principal regarding emergency motion (.8); analysis of motion / abandonment issues (2.7)	B130	WSR	5.50	3,300.00
1/15/2025	Revise witness and exhibit list for Trustee's emergency motion to relinquish and abandon (.3); review and analyze debtors' documents and emails, third party document productions, related communications with K. Saindon re: A&M document production (1.7).	B130	JDC	2.00	1,000.00
1/15/2025	Prepare for and participate in telephone conference with PI counsel for N. Miller re: discovery issues (0.9); communication with client re: same (0.1)	B190	BAB	1.00	600.00
1/15/2025	Telephone conference with S. Thomas re: Genesis admin claim (0.2); receipt and review of motion to withdraw same (0.2); review filed notice of withdrawal (0.1); communication to client re: same (0.2)	B310	BAB	0.70	420.00
1/15/2025	email to S. Seilheimer (AXIP) re asset abandonment	B130	NJS	0.30	120.00
1/15/2025	phone call with B. Brown and N. Blanda (Miller counsel) re discovery for Mr. Miller's district court suit	B190	NJS	0.30	120.00
1/15/2025	email to M. Warner re discussions with Miller counsel concerning discovery for district court suit	B190	NJS	0.20	80.00
1/15/2025	Receipt of A&M native data emails; download and storage of same.	B130	KAH	0.20	60.00
1/15/2025	Continue pulling possible pleadings/documents to be used as exhibits for MT Relinquish/Abandon hearing; emails related to same.	B130	KAH	0.40	120.00
1/15/2025	Attention to CIMA document production	B130	KAH	0.20	60.00
1/15/2025	Conducting research re NRW motion	B130	AWM	3.20	640.00
1/16/2025	Gathering employee information for other Cox litigation.	B190	KAH	0.60	180.00
1/16/2025	Attention to proposed carveout arrangement with Lenders and related communications with L. Phillips and M. Warner.	B230	PDS	1.20	720.00
1/16/2025	Call with R. Chaddick and A. Greenbaum re relinquishment motion (.3) communication with T. Thriffiley re sale of assets in QB (.1);	B130	PDS	0.30	180.00
1/16/2025	communication with A. Lowe re discovery information assistance.	B190	PDS	0.10	60.00
1/16/2025	Attention to state court litigation discovery requests	B190	BWA	0.30	150.00

1/16/2025	Review and analysis of proposed Highland Group insurance settlement (2.6); tc with Matt Jones, counsel for Highland Group (.2); revising insurance settlement agreement (1.2); tc with Trustee regarding same (.3); receive/review various NDA request issues (.5); tc with and emails from Mr. Dykes regarding pending issues (.3)	B130	WSR	5.70	3,420.00
1/16/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	0.50	250.00
1/16/2025	communication with D. Stewart re discovery sought in district court cases	B190	NJS	0.40	160.00
1/16/2025	Review/analyze dockets for district court cases where discovery is sought	B190	NJS	0.90	360.00
1/16/2025	Communication with counsel re: GOM NDA, analysis of issues (.70); Communication with J. Bailey re: TGS NDA redlines, analysis of same (.90); Analysis of Kroll destruction request (.20)	B190	BWA	1.80	900.00
1/16/2025	Communications with counsel for Cox in Miller suit re: status of discovery	B190	BAB	0.70	420.00
1/16/2025	phone call with K. Thompson (Hidden Assets) re employment application	B160	NJS	0.20	80.00
1/17/2025	analysis of potential litigation asset owned by non-debtor subsidiary Energy XXI Onshore, review of related pleadings, extensive negotiations with Lenders and M. Jones, multiple calls with M. Warner, and preparation of Chapter 7 filing.	B130	PDS	8.20	4,920.00
1/17/2025	Attention to CIMA Supplemental Doc Production; upload to Everlaw	B190	KAH	0.30	90.00
1/17/2025	Analysis of EXXI Onshore proposed Highlander Agreement issues; analysis of EXXI Onshore corporate issues (3.2); drafting Amended and Restated Operating Agreement (2.0); drafting LLC consent to file Ch 7 (.5)	B130	WSR	5.70	3,420.00
1/17/2025	Emails from Mr. Dykes regarding various issues; email to/from W&T; tc with Trustee regarding same	B130	WSR	0.70	420.00
1/17/2025	comparison of executed and unexecuted confidentiality agreement by GOM Shelf	B190	NJS	0.50	200.00
1/17/2025	Communication with GOM counsel re: NDA and document access, communication with paralegal and IT re: login credentials (1.30); Communication with Veritrust (.20)	B190	BWA	1.50	750.00
1/19/2025	review of, and comments and revisions to, revised stipulation with Lenders re carveout and application of funds.	B230	PDS	3.50	2,100.00
1/19/2025	Emails with client re: N. Miller litigation and discussion needs relating to same	B190	BAB	0.20	120.00
1/20/2025	Attention to January payables; update spreadsheet.	B210	KAH	0.20	60.00
1/20/2025	Draft Notice of Appearance for PDS in Energy XXI Onshore	B190	KAH	0.20	60.00
1/20/2025	review of, and comments and revisions to, proposed Lender stip and multiple related communications with M. Warner.	B230	PDS	5.20	3,120.00



1/20/2025	Attention to NRW document production; work with IT to download same; upload to Everlaw.	B130	KAH	0.70	210.00
1/20/2025	Providing document access to M. Bishop; multiple emails related to same.	B190	KAH	0.30	90.00
1/20/2025	Analysis of ownership of leases and wells relating to Hedron casualty and related communications with M. Warner and M. Bergeron (1.3); analysis of Ida claims and related communications with Lenders and M. Warner (.5); conference call re Hedron settlement (1.0);	B190	PDS	2.80	1,680.00
1/20/2025	Communication with GOM counsel and IT re: document access	B190	BWA	0.80	400.00
1/21/2025	review various asset sale issues (.6); conference with W&T regarding pending purchases (.3); emails regarding EXXI Onshore issues (.3)	B130	WSR	1.20	720.00
1/21/2025	Revising Exhibit A to Trustee's Notice of Abandonment of State Leases	B130	AWM	2.30	460.00
1/21/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	2.50	1,250.00
1/21/2025	Correspondence from TGS counsel re: NDA	B190	BWA	0.10	50.00
1/21/2025	Conducting research on 11 USC 541 relating to NRW motion	B130	AWM	0.30	60.00
1/22/2025	attend scheduled call to discuss N. Miller matter with B. Borwn	B190	NJS	0.40	180.00
1/22/2025	Review purchase status (.2); email regarding W&T issues (.2); review boarding agreement (.4); emails regarding NRW discovery issues (.5); emails from EXXI trustee (.2)	B130	WSR	1.50	975.00
1/22/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	3.80	2,090.00
1/22/2025	Review of documents produced by NRW, Array, and CIMA in preparation for upcoming hearing on relinquishment and abandonment.	B130	PDS	3.30	2,145.00
1/22/2025	Analysis of proposed Hedron settlement and related carveout for estate and contingency fee calculations and multiple related communications with M. Warner, B. Barriere, and L. Phillips.	B130	PDS	5.90	3,835.00
1/22/2025	Communications with M. Warner re: Miller litigation and need to discuss discovery issues	B190	BAB	0.50	325.00
1/22/2025	Emails with M. Borror re: status of 401k winddown (0.2); review and analyze documentary attachments outlining needs to terminate plan (0.8)	B220	BAB	1.00	650.00
1/22/2025	Conducting research on 11 USC 541 relating to NRW motion (4.9); Drafting research memo re same	B130	AWM	7.40	2,960.00
1/22/2025	Editing Exhibit A to Trustee's Notice of Abandonment of State Leases	B130	AWM	0.40	160.00
1/23/2025	Emails and analysis regarding asset sale and carveout issues (.5); review and analyze possible NRW stipulation / settlement / continuance (1.8); review and analyze records request from TGS (.4)	B130	WSR	0.00	0.00

1/23/2025	Review and analyze debtors' documents and emails, third party document productions (1); draft stipulation re: abandonment motion (4.1).	B130	JDC	5.10	2,805.00
1/23/2025	review of, and comments and revisions to, tri-party settlement agreement and related communications with M. Warner and Fishman team (.9) preparation for upcoming hearing on relinquishment and abandonment and related communications with A. Mendez, J. Cangelosi, and M. Warner (2.4); communication with B. Barriere and L. Philips re Hedron settlement statement (.3); conference call with M. Warner and Fishman team re tri-party agreement and related communications with B. Barriere and L. Phillips (1.4); communication with Interior re Relinquishment and Abandonment Motion (.1); review of, and comments and revisions to, proposed NRW stipulation and related communications with A. Mendez, R. Kuebel, J. Cangelosi and W. Robbins (2.5).	B130	PDS	7.60	4,940.00
1/23/2025	Review request from litigant to obtain records from estate, begin analysis of issues relating to same	B190	BAB	0.50	325.00
1/23/2025	Communication with J. Bailey (TGS) re: NDA and document access, analysis of same	B190	BWA	0.30	165.00
1/24/2025	Attention to payables; update spreadsheet.	B210	KAH	0.10	30.00
1/24/2025	Preparing exhibits for Relinquish/Abandon motion hearing; multiple emails re same	B190	KAH	0.70	210.00
1/24/2025	Analysis of NRW stipulation issues (1.2)); review / revise proposed stipulation / continuance (1.3); review and analyze GOM Shelf issues and assets / ownership lists (1.0); conference with GOM Shelf counsel regarding same (.4); email to Trustee regarding pending issues (.3); tc and email with Mr. Dykes regarding pending issues (.3)	B130	WSR	4.10	2,665.00
1/24/2025	Review and analyze debtors' documents and emails, third party document productions, communications with B. York re: deficient production (3.2); revise witness and exhibit list, stipulation for abandonment motion (.3).	B130	JDC	3.50	1,925.00
1/24/2025	review of, and comments and revisions to, Hedron settlement agreement and related communications with M. Warner and M. Bergeron.	B190	PDS	1.50	975.00
1/24/2025	Draft/revise proposed settlement with NRW and related communications with M. Warner, A. Mendez, R. Lamb, and R. Kubel.	B130	PDS	5.80	3,770.00
1/25/2025	Prepare for upcoming hearing on relinquishment and abandonment and revisions to witness and exhibit list and related communications with M. Warner and R. Dykes.	B130	PDS	4.20	2,730.00
1/25/2025	Attention to TGS NDA redlines	B190	BWA	0.20	110.00
1/26/2025	Review and revise witness and exhibit list, prepare for upcoming hearing on relinquishment and abandonment and related communications with M. Warner (8.9); review of, and comments and revisions to, updated settlement package from Fishman re Hedron suit and related communications with Fishman and M. Warner (.8).	B130	PDS	9.70	6,305.00
1/26/2025	Communication with J. Bailey and TGS team re: scheduling NDA call	B190	BWA	0.30	165.00

1/27/2025	Review/analyze NRW objection to Trustee's abandonment motion	B130	NJS	0.20	90.00
1/27/2025	Conducting research on abandonment of estate property	B130	AWM	0.80	320.00
1/27/2025	Review and analyze various evidentiary and other issues arising in NRW hearing (3.8); email to/from W&T Counsel (.3); review USA, GOM Shelf, NRW and MacMoRan objections to abandonment (1.5); tc with counsel for GOM Shelf (.2); review and analyze abandonment and other Midlantic issues (1.8); tc with Mr. Dykes regarding motion issues (.3)	B130	WSR	7.80	5,070.00
1/27/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	1.60	880.00
1/27/2025	Review, revise and finalize witness and exhibit list (3.5), prepare for upcoming hearing on relinquishment and abandonment (5.4) and related communications with M. Warner (1.1), R. Kuebel (.6); R. Lamb (.1), R. Dykes (.8).	B130	PDS	11.50	7,475.00
1/27/2025	Prepare for and participate in telephone conference with counsel for TGS re: document availability, analyze issues arising from request, telephone conference with P Scharf re: same, review documents on underlying suit provided by Scharf	B190	BAB	1.80	1,170.00
1/27/2025	Assist with preparation for hearing on motion to abandon remaining legal title over NRW leases (0.8), review and analysis of GOM Shelf opposition (0.5); NRW opposition to same (0.6); USA objection (0,8)	B130	BAB	2.70	1,755.00
1/27/2025	Revisions to Witness/Exhibit List; preparing exhibits.	B130	KAH	1.80	540.00
1/27/2025	Preparing exhibit binders and hearing pleadings.	B130	KAH	4.20	1,260.00
1/27/2025	Conducting research on evidentiary issues relating to NRW motion.	B130	AWM	6.70	2,680.00
1/27/2025	Telephone conference and email communication with TGS counsel re: NDA issues, analysis of same (.90); Communication with A. Carr re: GOM Shelf NDA and document access request (.30); Communication with Kroll re: destruction (.10)	B190	BWA	1.30	715.00
1/27/2025	Analyze exhibit redaction issue	B130	BWA	0.80	440.00
1/28/2025	Attend hearing on MT Relinquish and Abandon to assist with exhibits.	B190	KAH	3.80	1,140.00
1/28/2025	Emails with PI counsel re: N. Miller discovery issues, email to client re: same	B190	BAB	0.30	195.00
1/28/2025	Travel to/from hearing on MT Abandon (9); conferences and analysis regarding hearing issues (2); attend hearing (4) (1/2 travel)	B130	WSR	10.50	6,825.00
1/28/2025	Communication with GOM shelf re: additional credentials, analysis of same	B190	BWA	0.60	330.00
1/28/2025	Prepare for and attend hearing on relinquishment and abandonment in Houston (1/2 travel).	B130	PDS	10.50	6,825.00
1/29/2025	Revisions to November invoice.	B160	KAH	0.70	210.00
1/29/2025	Review and analyze debtors' documents and emails, third party document productions, summarize findings.	B130	JDC	4.50	2,475.00

1/29/2025	Analysis of potential employment of additional professionals	B160	BWA	0.60	330.00
1/29/2025	communication with R. Dykes re decommissioning orders (.1); multiple communications with M. Warner re strategy moving forward with NRW and other issues (1.4); communication with R. Kuebel re NRW settlement options (.6); planning and strategy regarding course forward for NRW - US negotiations and abandonment (2.3).	B130	PDS	4.40	2,860.00
1/29/2025	Telephone conference with M. Warner re: 401k winddown issues, emails with M. Borror re: same	B220	BAB	0.50	325.00
1/29/2025	Prepare transcript order; make arrangements for same; emails to/from court reporter.	B130	KAH	0.30	90.00
1/29/2025	Review Chevron bond demand letters (.4); review and analyze Devon Bond issues (.5); review and analyze Spectrum collection offer (.5); emails from W&T Counsel (.3); review NRW document demand and analysis regarding same (.4); email and analysis regarding various other document requests (.4).	B130	WSR	2.50	1,625.00
1/29/2025	Communication with Kroll and Trustee re: Kroll's request to destroy (1.10); Analysis of NRW's request for documents and proposed NDA (.30); Communication with GOM re: additional credentials, analysis of same (.50); Communication with A. Carr re: requests for access (.50)	B190	BWA	2.40	1,320.00
1/30/2025	Continued revisions to November invoice.	B160	KAH	0.90	270.00
1/30/2025	email to B. Altazan and D. Stewart re employment of personnel to pursue unclaimed assets	B160	NJS	0.10	45.00
1/30/2025	discussion with W. Robbins re employment of personnel to pursue unclaimed assets	B160	NJS	0.10	45.00
1/30/2025	zoom call with D. Stewart, and B. Altazan re Hidden Assets employment and non-testifying expert for special counsel	B160	NJS	0.30	135.00
1/30/2025	prepare for call with D. Stewart and B. Altazan re employment of Hidden Assets and expert	B160	NJS	0.20	90.00
1/30/2025	Analysis of potential employment of additional professionals	B160	BWA	0.30	165.00
1/30/2025	Email to Kroll re: specifics of documents they seek to destroy	B110	BWA	0.10	55.00
1/30/2025	Telephone call with Talos regarding SL release; telephone call with W&T regarding sale issues and other pending pipeline issues (.7); review and analyze Winkler / Spectrum collection issue and teleconference with Mr. Dykes regarding same (2.5); email to Mr. Warner regarding same (.4); consider carveout issues (.6)	B130	WSR	4.20	2,730.00

1/30/2025	communication with B. Barriere and M. Warner re NRW and Hedron issues (1.8); communication with L. Phillips re Lenders' stipulation and other issues (.5); communication with N. Smeltz and B. Altazan re various employment issues (.4); communication with M. Warner and W. Robbins re Stone Pigman files and potential assets therein (.4);communication with B. Dassa re NRW funds (.1); review of, and comments and revisions to, Hedron scheduling order and related communications with B. Barriere and M. Warner (.3);	B190	PDS	2.50	1,625.00
1/30/2025	Communication with R. Kuebel re NRW resolution	B130	PDS	0.20	130.00
1/31/2025	Preparing spreadsheet of outstanding payables and professional fees for B. Dassa	B210	KAH	0.60	180.00
1/31/2025	tc with Spectrum regarding collection and other case issues (.3); tc with Army Long regarding property for purchase and other issues (.2); consider tax sale issues (.4); consider lien issues for EXXI Onshore (.3); emails to/from Trustee regarding NRW issues (.2)	B130	WSR	1.40	910.00
1/31/2025	Attention to and communication with GOM counsel re: document access	B110	BWA	0.30	165.00
1/31/2025	communication with M. Warner re potential chapter 5 COA.	B180	PDS	0.20	130.00
1/31/2025	Emails with M. Borrer re: 401k plan winddown status	B220	BAB	0.20	130.00
1/31/2025	Telephone conferences with client, R. Dykes, C. Sonnier re: Miller suit, discovery issues	B190	BAB	1.40	910.00
1/31/2025	Telephone calls with Jefferson Parish Sheriff's Office and City of Grand Isle re Energy XXI Onshore bankruptcy/stay in place prohibiting tax sales; correspondence to both regarding same; emails with W. Robbins re same.	B130	KAH	0.50	150.00
<b>Total</b>				<b>408.70</b>	<b>\$216,810.00</b>

**FEE EARNER SUMMARY**

<b>Fee Earner</b>	<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
PDS Paul Douglas Stewart, Jr.	136.50	624.65	85,265.00
WSR William S. Robbins	75.30	621.25	46,780.00
AWM Abigail W. Mock	49.90	261.32	13,040.00
BAB Brandon A. Brown	28.20	615.78	17,365.00
BWA Brooke W. Altazan	23.20	515.52	11,960.00
JDC Jamie D. Cangelosi	53.70	517.23	27,775.00
KAH Kimberly A. Heard	22.00	300.00	6,600.00
NJS Nicholas J. Smeltz	19.90	403.27	8,025.00

**TASK SUMMARY**

<b>Task</b>	<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
B110 Case Administration	1.30	515.38	670.00
B120 Asset Analysis and Recovery	0.10	400.00	40.00
B130 Asset Disposition	328.50	537.95	176,715.00
B140 Relief from Stay/Adequate Protection Proceedings	1.90	400.00	760.00
B150 Meetings of and Communications with Creditors	2.50	500.00	1,250.00
B160 Fee/Employment Applications	6.60	396.97	2,620.00
B180 Avoidance Action Analysis	0.20	650.00	130.00
B190 Other Contested Matters(excluding assumptions/reje	52.20	495.98	25,890.00
B210 Business Operations	2.90	396.55	1,150.00
B220 Employee Benefits/Pensions	1.90	644.74	1,225.00
B230 Financing/Cash Collections	9.90	600.00	5,940.00
B310 Claims Administration and Objections	0.70	600.00	420.00

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
1/14/2025	Texas Secretary of State database fees for entity inquiries	1.00
1/17/2025	Filing fee	338.00
1/29/2025	Mileage to/from Houston and parking to SDTX Courthouse for 1/27/2025 hearing in Cox	416.60
1/29/2025	Transcript of hearing re: Trustee's Motion to Relinquish and Abandon	912.60
1/31/2025	Copies for January 2025	1,609.20
1/31/2025	Everlaw for January 2025	107.00
1/31/2025	Everlaw-ECA for January 2025	29.96
1/31/2025	Pacer for January 2025	125.20
1/31/2025	Project manager time	450.00
1/31/2025	Project manager time	225.00
<b>Total DISBURSEMENTS</b>		<b>\$4,214.56</b>

**PAYMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
5/14/2025	Wire from MLCJR LLC	800,000.00
<b>Total PAYMENTS</b>		<b>\$800,000.00</b>

New Charges

\$221,024.56

Previous Balance	\$1,204,581.38
Payments	<u>-\$800,000.00</u>
<b>Balance Forward</b>	<b>\$404,581.38</b>
 <b>Balance Due</b>	 <b><u>\$625,605.94</u></b>



**Trust Statement**

Date	Description	Receipts
4/2/2025	Williams Companies and its subsidiaries, including Discovery Gas Transmission	33,700.00
	Settlement of Williams Companies and its subsidiaries, including Discovery Gas Transmission	
	<b>Total</b>	<hr/> <b>\$33,700.00</b>
	<b>Trust Balance</b>	<b>\$33,700.00</b>

**SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

**EXHIBIT “B”  
AGGREGATE EXPENSES**

<b>Expense</b>	<b>Amount</b>
Copies	\$2,271.40
PACER	\$210.30
Service of Pleadings	\$8,130.26
Data Preservation	\$459.22
Corporate Records	\$2,768.16
Tax Records	\$4.00
EDI Costs	\$838.71
Filing Fees	\$338.00
Work Travel	\$416.60
Transcript Fees	\$912.60
<b>Total</b>	<b>\$16,349.25</b>

**SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

**EXHIBIT “C”  
AGGREGATE FEES BY TASK CODE**

<b>ABA Bankruptcy Project Task Code</b>	<b>Hours</b>	<b>Percent</b>	<b>Amount</b>	<b>Percent</b>	<b>Blended Rate</b>
B110 Case Administration	6.40	0.33%	\$3,280.00	0.35%	\$512.50
B120 Asset Analysis and Recovery	33.10	1.71%	\$18,490.00	1.96%	\$558.61
B130 Asset Disposition	1492.20	77.31%	\$751,355.00	79.56%	\$503.52
B140 Relief from Stay/Adequate Protection Proceedings	16.90	0.88%	\$9,440.00	1.00%	\$558.58
B150 Meetings of and Communications with Creditors	2.80	0.15%	\$1,430.00	0.15%	\$510.71
B160 Fee/Employment Applications	76.30	3.95%	\$32,510.00	3.44%	\$426.08
B180 Avoidance Action Analysis	0.50	0.03%	\$280.00	0.03%	\$560.00
B190 Other Contested Matters	90.00	4.66%	\$39,450.00	4.18%	\$438.33
B210 Business Operations	14.50	0.75%	\$5,630.00	0.60%	\$388.28
B220 Employee Benefits/Pensions	67.50	3.50%	\$21,305.00	2.26%	\$315.63
B230 Financing/Cash Collections	9.90	0.51%	\$5,940.00	0.63%	\$600.00
B240 Tax Issues	3.70	0.19%	\$1,590.00	0.17%	\$429.73
B310 Claims Administration and Objections	115.70	5.99%	\$53,250.00	5.64%	\$460.24
B320 Plan and Disclosure Statement	0.70	0.04%	\$420.00	0.04%	\$600.00
<b>Total</b>	<b>1930.20</b>	<b>100.00%</b>	<b>\$944,370.00</b>	<b>100.00%</b>	<b>\$489.26</b>

**SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

**EXHIBIT “D”  
AGGREGATE FEES BY PROFESSIONAL**

<b>Professional</b>	<b>Title</b>	<b>Year Licensed</b>	<b>Hours</b>	<b>Percent</b>	<b>Amount</b>	<b>Percent</b>	<b>Blended Rate</b>
Abigail W. Mock	Associate	LA - 2024	383.40	19.86%	\$99,640.00	10.55%	\$259.89
Brandon A. Brown	Member	LA - 1998	114.40	5.93%	\$69,085.00	7.32%	\$603.89
Brooke W. Altazan	Member	LA - 2009	186.40	9.66%	\$93,560.00	9.91%	\$501.93
Kimberly A. Heard	Paralegal	N/A	66.10	3.42%	\$19,830.00	2.10%	\$300.00
Nicholas J. Smeltz	Associate	LA - 2019	112.60	5.83%	\$45,105.00	4.78%	\$400.58
Paul D. Stewart, Jr.	Member	LA - 1996	421.80	21.85%	\$256,445.00	27.16%	\$607.98
William S. Robbins	Member	LA - 1996	354.30	18.36%	\$214,180.00	22.68%	\$604.52
Jamie D. Cangelosi	Of Counsel	LA - 2000	291.20	15.09%	\$146,525.00	15.52%	\$503.18
<b>Total</b>			<b>1930.20</b>	<b>100.00%</b>	<b>\$944,370.00</b>	<b>100.00%</b>	<b>\$489.26</b>

**SECOND INTERIM FEE APPLICATION OF STEWART ROBBINS BROWN &  
ALTAZAN LLC AS COUNSEL TO THE CHAPTER 7 TRUSTEE FOR THE  
PERIOD OF OCTOBER 1, 2024 THROUGH JANUARY 31, 2025**

**EXHIBIT “E”  
FORM 2**

## Form 2

### Cash Receipts And Disbursements Record

Page: 1

Case No.: 23-90324  
Case Name: MLCJR LLC  
L.L.C. Cox Oil Offshore  
Taxpayer ID #: \*\*-\*\*\*0875  
For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)  
Bank Name: Metropolitan Commercial Bank  
Account #: \*\*\*\*\*9687 Checking  
Blanket Bond (per case limit): N/A  
Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
05/16/24		Transfer of Estate Funds from Veritex Community Bank	WIRE IN FROM MLCJR LLC	1290-000	2,079,378.05		2,079,378.05
05/16/24		Metropolitan Bank Wire Fee	Metropolitan Bank Wire Fee	2600-000		10.00	2,079,368.05
05/17/24		Metropolitan Bank Wire Fee Refund	Metropolitan Bank Wire Fee Refund	2600-000		-10.00	2,079,378.05
05/31/24	101	Thomas R. Dykes	M&M Contract Labor	2990-000		9,262.50	2,070,115.55
05/31/24	102	Benjamin Marchive	M&M Contract Labor	2990-000		4,987.50	2,065,128.05
05/31/24	103	Johnny Robinson	M&M Contract Labor	2990-000		2,565.00	2,062,563.05
05/31/24	104	Jamie Meylian	M&M Contract Labor	2990-000		1,923.75	2,060,639.30
05/31/24	105	Toby Mendoza	M&M Contract Labor	2990-000		1,653.00	2,058,986.30
05/31/24	106	Lawrence Boyd	M&M Contract Labor	2990-000		2,280.00	2,056,706.30
05/31/24	107	Michael Graham	M&M Contract Labor	2990-000		1,995.00	2,054,711.30
05/31/24	108	Randy Williams	80% Fees - March & April 2024	3991-000		131,957.93	1,922,753.37
05/31/24	109	Chamberlain Hrdlicka	80% fees/100% expenses - March & April 2024			200,580.04	1,722,173.33
		Chamberlain Hrdlicka	80% March & April 2024 fee request \$198,962.00	2990-000			
		Chamberlain Hrdlicka	100% March & April 2024 expense request \$1,618.04	2990-000			
05/31/24	110	TPS - West, LLC	80% fees/100% expenses - March & April 2024			18,603.44	1,703,569.89
		TPS - West, LLC	80% fees March & April 2024 fee request \$15,340.00	2990-000			
		TPS - West, LLC	100% expenses March & April fee request \$3,263.44	2990-000			
05/31/24	111	NJZ Computer Services, LLC	w/e 5.3.24 and 5.10.24 Voided on 05/31/2024	2990-004		2,850.00	1,700,719.89
05/31/24	111	NJZ Computer Services, LLC	w/e 5.3.24 and 5.10.24 Voided: check issued on 05/31/2024	2990-004		-2,850.00	1,703,569.89
05/31/24	112	Connection Business Solutions	Invoice #17005694 Stopped on 06/10/2024	2990-005		3,715.00	1,699,854.89
05/31/24	113	NJZ Computer Services, LLC	w/e 5.3.24, 5.10.24, 5.17.24, & 5.24.24	2990-001		4,425.00	1,695,429.89

Page Subtotals: **\$2,079,378.05** **\$383,948.16**

{ } Asset Reference(s)

! - transaction has not been cleared

## Form 2

### Cash Receipts And Disbursements Record

Page: 2

Case No.: 23-90324  
Case Name: MLCJR LLC  
L.L.C. Cox Oil Offshore  
Taxpayer ID #: \*\*-\*\*\*0875  
For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)  
Bank Name: Metropolitan Commercial Bank  
Account #: \*\*\*\*\*9687 Checking  
Blanket Bond (per case limit): N/A  
Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
05/31/24	114	Clean Gulf Associates, Inc.	Invoice #s 2421079 & 2431076	2990-000		49,408.03	1,646,021.86
05/31/24	115	Compliance Technology Group	Invoice #9913	2990-000		10,171.00	1,635,850.86
05/31/24	116	Mayra Sifuentes	4.29.24 and 5.1.24	2990-000		4,140.00	1,631,710.86
05/31/24	117	Forefront Emergency Management	Invoice #s 4-15637 & 4-15655	2990-000		10,000.00	1,621,710.86
05/31/24	118	Westwind Helicopters	Invoice #13144	2990-000		9,607.92	1,612,102.94
05/31/24	119	Thomas Dykes	M&M Contract Labor - May 2024	2990-000		16,000.00	1,596,102.94
06/10/24	112	Connection Business Solutions	Invoice #17005694 Stopped: check issued on 05/31/2024	2990-005		-3,715.00	1,599,817.94
06/10/24	120	Veritrust	Inv #1125378	2990-000		50,335.22	1,549,482.72
06/10/24	121	Dartpoints	Invoice #s 130285 & 130030	2990-000		5,760.60	1,543,722.12
06/21/24	122	Michael D. Warner	80% Fees - May 2024 Voided on 06/27/2024	2100-004		11,598.60	1,532,123.52
06/21/24	123	TPS - West, LLC	80% fees/100% expenses - May 2024			1,665.96	1,530,457.56
		TPS - West, LLC	80% fees May 2024 fee request \$1,651.20	2990-000			
		TPS - West, LLC	100% expenses May 2024 fee request \$14.76	2990-000			
06/21/24	124	Stewart Robbins Brown & Altazan LLC	80% fees/100% expenses - May 2024			189,595.10	1,340,862.46
		Stewart Robbins Brown & Altazan LLC	80% fees May 2024 fee request \$164,256.00	3210-000			
		Stewart Robbins Brown & Altazan LLC	100% expenses May 2024 fee request \$25,339.10	3220-000			
06/25/24	125	Chamberlain Hrdlicka	80% fees/100% expenses - May 2024			26,441.20	1,314,421.26
		Chamberlain Hrdlicka	80% fees May 2024 fee request \$26,134.00	2990-000			
		Chamberlain Hrdlicka	100% expenses May 2024 fee request \$307.20	2990-000			
06/27/24	122	Michael D. Warner	80% Fees - May 2024 Voided: check issued on 06/21/2024	2100-004		-11,598.60	1,326,019.86

Page Subtotals: \$0.00 \$369,410.03

{ } Asset Reference(s)

! - transaction has not been cleared



Form 2  
Cash Receipts And Disbursements Record

Page: 3

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
06/27/24	126	Pachulski Stang Ziehl & Jones, LLP	80% Fees - May 2024	2100-000		11,598.60	1,314,421.26
07/08/24	127	Compliance Technology Group	Invoice #9951	2990-000		10,171.00	1,304,250.26
07/08/24	128	NJZ Computer Services, LLC	Weeks ending: 5.31.24; 6.7.24; 6.14.24; 6.21.24; 6.28.24	2990-000		7,800.00	1,296,450.26
07/08/24	129	Forefront Emergency Management	Invoice #4-15762	2990-000		15,000.00	1,281,450.26
07/08/24	130	Grand Isle Shipyards	Invoice #: *****-0001	2990-000		1,768.86	1,279,681.40
07/08/24	131	American Eagle Trucking	Invoice #2461253	2990-000		700.00	1,278,981.40
07/08/24	132	Connection Business Solutions	Invoice #: 17005831	2990-000		6,988.80	1,271,992.60
07/08/24	133	NJZ Computer Services, LLC	Past due balance owed for work performed prior to 5.28.24	2990-000		525.00	1,271,467.60
07/08/24	134	RANDY WILLIAMS	Final Fee Amount due	2100-000		32,908.26	1,238,559.34
07/08/24	135	TRDkyes & Co, LLC	6.1.24 - 6.30.24	2990-000		30,400.00	1,208,159.34
07/08/24	136	Johnny Robinson	6.1.24 - 6.30.24	2990-000		2,500.00	1,205,659.34
07/08/24	137	Lawrence Boyd	6.1.24 - 6.30.24	2990-000		7,200.00	1,198,459.34
07/08/24	138	Michael Graham	6.1.24 - 6.30.24	2990-000		6,210.00	1,192,249.34
08/05/24		North Lane Technologies, Inc.	Credit	1290-000	430.33		1,192,679.67
08/05/24		North Lane Technologies, Inc.	DirecTV Credit	1290-000	298.83		1,192,978.50
08/05/24		North Lane Technologies, Inc.	DirecTV Credit	1290-000	315.31		1,193,293.81
08/05/24	139	Veritrust	Invoice #1127216	2990-000		28,131.89	1,165,161.92
08/05/24	140	Dartpoints	Invoice #s: 131630, 131374 & 132617	2990-000		8,162.20	1,156,999.72
08/05/24	141	Compliance Technology Group	Invoice #9985	2990-000		10,171.00	1,146,828.72
08/05/24	142	NJZ Computer Services, LLC	Weeks Ending: 7/5/24, 7/12/24; 7/19/24 & 7/26/24	2990-000		2,775.00	1,144,053.72
08/05/24	143	Manta Ray Gathering Company L.L.C.	Invoice #305908238	2990-000		18,845.98	1,125,207.74
08/05/24	144	TRDkyes & Co, LLC	M&M Contract Labor (July 2024)	2990-000		42,600.00	1,082,607.74
08/05/24	145	Johnny Robinson	M&M Contract Labor (July 2024)	2990-000		2,500.00	1,080,107.74
08/05/24	146	Lawrence Boyd	M&M Contract Labor (July 2024)	2990-000		10,400.00	1,069,707.74
08/05/24	147	Michael Graham	M&M Contract Labor (July 2024)	2990-000		8,970.00	1,060,737.74
08/05/24	148	Stewart Robbins Brown & Altazan, LLC	Monthly Fee Statement (June 2024) 80% fees/100% expenses	7100-000		123,296.78	937,440.96
08/05/24	149	TPS - West, LLC	Monthly Fee Statement (June 2024) 80% fees/100% expenses	7100-000		9,796.09	927,644.87
08/05/24	150	Pachulski Stang Ziehl & Jones LLP	Monthly Fee Statement (June 2024) - 80% fees	7100-000		6,760.36	920,884.51

Page Subtotals: \$1,044.47 \$406,179.82

{ } Asset Reference(s)

! - transaction has not been cleared

Form 2  
Cash Receipts And Disbursements Record

Page: 4

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
08/26/24		North Lane Technologies Inc.	DirecTv Refund Credit	1290-000	1,561.77		922,446.28
09/05/24	151	Dartpoints	Inv #132874	2990-000		3,359.00	919,087.28
09/05/24	152	Compliance Technology Group	Invoices 10019 & 10055	2990-000		12,467.00	906,620.28
09/05/24	153	NJZ Computer Services, LLC	W/E 8.2.24, 8.9.24, 8.16.24, 8.23.24 and 8.30.24	2990-000		4,575.00	902,045.28
09/05/24	154	Clean Gulf Associates	4th Quarter	2990-000		5,000.00	897,045.28
09/05/24	155	Stewart Robbins Brown & Altazan, LLC	July 2024 monthly fee statement (80% fees/100% expenses)	7100-000		105,512.21	791,533.07
09/05/24	156	TPS - West, LLC	July monthly fee statement (80% fees/100% expenses)	7100-000		5,885.26	785,647.81
09/05/24	157	TRDkyes & Co, LLC	August 2024 services	2990-000		35,200.00	750,447.81
09/05/24	158	Johnny Robinson	August 2024 services	2990-000		2,500.00	747,947.81
09/05/24	159	Lawrence Boyd	August 2024 services	2990-000		10,400.00	737,547.81
09/05/24	160	Michael Graham	August 2024 services	2990-000		8,970.00	728,577.81
10/09/24		To Account #*****3772	Settlement Funds Transfer	9999-000		100,000.00	628,577.81
10/21/24	161	Dartpoints	Invoices 133867, 134119, 135179 & 135180	2990-000		11,521.20	617,056.61
10/21/24	162	Compliance Technology Group	Inv #10055 & 10090	2990-000		3,696.00	613,360.61
10/21/24	163	NJZ Computer Services, LLC	W/E: 9.13.24, 9.20.24, 9.27.24, 10.4.24, and 10.11.24	2990-000		3,675.00	609,685.61
10/21/24	164	Veritrust	Inv #s 1128308, 1129406, and 1130440	2990-000		44,316.78	565,368.83
10/21/24	165	FileLink	Inv #s 208567, 209599, and 209839	2990-000		9,352.00	556,016.83
10/21/24	166	Stewart Robbins Brown & Altazan, LLC	August 2024 Fee Statement (Dkt. 2241 - 80% fees/100% expenses)	7100-000		140,171.49	415,845.34
10/21/24	167	TPS - West, LLC	August 1-31 Fee Statement (Dkt. 2242) - 80% Fees/100% Expenses	7100-000		4,067.20	411,778.14
10/21/24	168	Pachulski Stang Ziehl & Jones LLP	July 1 - August 31, 2024 Fee Statement (Dkt. 2211) - 80% Fees: \$9,469.95	2100-000		9,469.95	402,308.19
10/21/24	169	TRDkyes & Co, LLC	September Invoice	2990-000		27,800.00	374,508.19
10/21/24	170	Johnny Robinson	September Invoice	2990-000		2,500.00	372,008.19
11/05/24	171	Compliance Technology Group	Invoice #10124	2990-000		2,996.00	369,012.19
11/05/24	172	NJZ Computer Services, LLC	W/E: 10.18.24, 10.25.24, and 11.2.24	2990-000		2,100.00	366,912.19
11/05/24	173	TPS - West, LLC	September 2024 Fee Statement (80% fees/100% expenses)	7100-000		18,026.40	348,885.79
11/05/24	174	TRDkyes & Co, LLC	Oct 2024	2990-000		34,000.00	314,885.79
Page Subtotals:					\$1,561.77	\$607,560.49	

Form 2  
Cash Receipts And Disbursements Record

Page: 5

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
12/10/24	175	NJZ Computer Services, LLC	w/e 11-8-24; 11-15-24; 11-22-24; 11-29-24	2990-000		2,550.00	312,335.79
12/10/24	176	Veritrust	Inv# 1131690	2990-000		5,268.14	307,067.65
12/10/24	177	FileLink	Invoice #s 210233 & 210318	2990-000		504.00	306,563.65
12/10/24	178	Michael D. Warner	80% fees per September-October 2024 fee statement [Dkt. 2291]	7100-000		10,810.51	295,753.14
12/10/24	179	TRDKyes & Co, LLC	November 2024	2990-000		25,600.00	270,153.14
12/18/24	180	Chamberlain Hrdlicka	Balance due per Court Order [Dkt. 2317]	2990-000		65,085.98	205,067.16
01/07/25	181	Dartpoints	Invoice #s137860, 138103, 136502, 136785	2990-000		11,521.20	193,545.96
01/07/25	182	NJZ Computer Services, LLC	W/E: 12.6.24, 12.13.24, 12.20.24, 12.27.24 Voided on 02/24/2025	2990-004		2,175.00	191,370.96
01/07/25	183	Neuralog	Invoice #:201620337 Voided on 02/20/2025	2990-004		4,275.88	187,095.08
01/07/25	184	Clean Gulf Associates	Invoice #: 2511017	2990-000		5,000.00	182,095.08
01/07/25	185	Compliance Technology Group	Invoice #: 10184	2990-000		2,996.00	179,099.08
01/07/25	186	TPS - West, LLC	80% Fees/100% Expenses October Fee Statement (Dkt. 2319)	7100-000		4,414.60	174,684.48
01/07/25	187	TRDKyes & Co, LLC	Nov. 2024	2990-000		20,000.00	154,684.48
01/30/25		To Account #*****9687	Deposited in Cash Collateral Account in error.	9999-000	25,000.00		179,684.48
02/11/25	188	Dartpoints	Invoice #s 139072, 139311, 140338, 140575	2990-000		11,521.20	168,163.28
02/11/25	189	NJZ Computer Services, LLC	w/e 1.3.25, 1.10.25, 1.17.25, 1.24.25, and 1.31.25	2990-000		2,700.00	165,463.28
02/11/25	190	Compliance Technology Group	Invoice #10184	2990-000		2,996.00	162,467.28
02/11/25	191	FileLink	Invoice #s 210581 & 210817	2990-000		504.00	161,963.28
02/11/25	192	Pride Oil & Gas Properties, Inc.	Invoice #125018	2990-000		250.00	161,713.28
02/11/25	193	Michael D. Warner	20% Holdback of 1st Interim Fee Application (5.6.24 - 9.30.24) Voided on 03/10/2025	7100-004		9,492.89	152,220.39
02/11/25	194	TRDKyes & Co, LLC	Contract Labor	2990-000		27,500.00	124,720.39
02/20/25	183	Neuralog	Invoice #:201620337 Voided: check issued on 01/07/2025	2990-004		-4,275.88	128,996.27
02/24/25	182	NJZ Computer Services, LLC	W/E: 12.6.24, 12.13.24, 12.20.24, 12.27.24 Voided: check issued on 01/07/2025	2990-004		-2,175.00	131,171.27
02/24/25	195	NJZ Computer Services, LLC	w/e 12.6.24, 12.13.24, 12.20.24 and 12.27.24	2990-000		2,175.00	128,996.27

Page Subtotals: \$25,000.00 \$210,889.52

Form 2  
Cash Receipts And Disbursements Record

Page: 6

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
03/04/25		Chamberlain, Hrdlicka, White, Williams & Aughtry	Overpayment of expenses to counsel of interim trustee	1290-000	532.80		129,529.07
03/10/25	193	Michael D. Warner	20% Holdback of 1st Interim Fee Application (5.6.24 - 9.30.24) Voided: check issued on 02/11/2025	7100-004		-9,492.89	139,021.96
03/10/25	196	NJZ Computer Services, LLC	w/e 2.7.25, 2.14.25, 2.21.25, and 2.28.25	2990-000		2,625.00	136,396.96
03/10/25	197	Veritrust	Inv. #s 1137702, 1136422, and 1135128	2990-000		17,911.68	118,485.28
03/10/25	198	Pachulski Stang Ziehl & Jones LLP	20% Holdback of 1st Interim Fee Application (5.6.24 - 9.30.24)	7100-000		9,492.89	108,992.39
03/10/25	199	Pachulski Stang Ziehl & Jones LLP	80% fees/100% expenses (November - Dec 2024 monthly fee application; Dkt #2376	7100-000		6,147.13	102,845.26
03/10/25	200	TRDkyes & Co, LLC	Feb 2025	2990-000		21,200.00	81,645.26
03/25/25	201	Dartpoints	Inv. #141542 (Feb 2025 invoice)	2990-000		2,401.60	79,243.66
03/25/25	202	Dartpoints	Inv #141981 (Dismantling of data center) Voided on 03/25/2025	2990-004		1,800.00	77,443.66
03/25/25	202	Dartpoints	Inv #141981 (Dismantling of data center) Voided: check issued on 03/25/2025	2990-004		-1,800.00	79,243.66
03/25/25	203	Dartpoints	Invoice #s 141981 and 141982 (fee for dismantling both data centers)	2990-000		3,600.00	75,643.66
03/25/25	204	Dartpoints	Invoice #141777 (Feb 2025 invoice)	2990-000		3,359.00	72,284.66
04/02/25	205	NJZ Computer Services, LLC	w/e 3.7.25, 3.14.25, 3.21.25 and 3.28.25	2990-000		3,000.00	69,284.66
04/02/25	206	Veritrust	Inv# 1139414	2990-000		6,321.77	62,962.89
04/02/25	207	FileLink	Invoice # 25220061	2990-000		252.00	62,710.89
04/02/25	208	TRDkyes & Co, LLC	March 2025	2990-000		16,800.00	45,910.89
04/02/25	209	TPS - West, LLC	80% Fees/100% Expenses November 2024 Fee Statement (Dkt. 2370)	7100-000		1,624.60	44,286.29
05/14/25		To Account #*****9687	Remaining balance from Hedron Settlement Sub-Account	9999-000	1,300,000.00		1,344,286.29
05/14/25		Stewart Robbins Brown & Altazan, LLC	WIRE TO STEWART ROBBINS BROWN A	8500-002		800,000.00	544,286.29
05/19/25	210	FileLink	Invoice #s 25220365, 25220621 & 25220497	2990-000		4,004.00	540,282.29
05/20/25	211	Pachulski Stang Ziehl & Jones LLP	80% fees/100% expenses (Jan - March 2024 MFA - Dkt. 2434)	2100-000		8,126.00	532,156.29
05/21/25	212	NJZ Computer Services, LLC	w/e 4.4.25, 4.11.25, 4.18.25, 4.25.25, 5.2.25	2990-000		2,625.00	529,531.29
05/21/25	213	Veritrust	Inv. #1140687	2990-000		6,321.77	523,209.52
05/21/25	214	Dartpoints	Inv #s 142989 & 142756	2990-000		5,760.60	517,448.92

Page Subtotals: \$1,300,532.80 \$912,080.15

Form 2  
Cash Receipts And Disbursements Record

Page: 7

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
05/21/25	215	TPS - West, LLC	December 2024 Monthly Fee Statement	2990-000		630.00	516,818.92
05/21/25	216	TRDkyes & Co, LLC	April 2024	2990-000		17,000.00	499,818.92
06/09/25	217	Pachulski Stang Ziehl & Jones LLP	Reimbursement of Trustee bond premiums Voided on 06/09/2025	2300-004		6,570.00	493,248.92
06/09/25	217	Pachulski Stang Ziehl & Jones LLP	Reimbursement of Trustee bond premiums Voided: check issued on 06/09/2025	2300-004		-6,570.00	499,818.92
06/09/25	220	Veritrust	Invoice #: 1138490	2990-000		43,563.84	456,255.08
06/13/25	219	Pachulski Stang Ziehl & Jones LLP	Reimbursement of Trustee bond premiums	2300-000		6,570.00	449,685.08
06/16/25	218	Pachulski Stang Ziehl & Jones LLP	May fee statement (80% fees: \$252,872.19; 100% expenses: \$10.27)	2100-000		252,882.46	196,802.62
06/16/25	221	NJZ Computer Services, LLC	w/e 5.9.25, 5.16.25, 5.23.25, 5.30.25	2990-000		2,175.00	194,627.62
06/16/25	222	Veritrust	Inv. #1141925	2990-000		6,349.61	188,278.01
06/16/25	223	Pachulski Stang Ziehl & Jones LLP	April 2025 Fee Statement (80% Fees/100% expenses) Voided on 06/18/2025	7100-004		8,969.10	179,308.91
06/16/25	224	TRDkyes & Co, LLC	6.1.25	2990-000		20,000.00	159,308.91
06/18/25	223	Pachulski Stang Ziehl & Jones LLP	April 2025 Fee Statement (80% Fees/100% expenses) Voided: check issued on 06/16/2025	7100-004		-8,969.10	168,278.01
06/30/25	225	Pachulski Stang Ziehl & Jones LLP	April Fee Statement [Dkt. 2464] 80% fees/100% expenses	2100-000		2,969.10	165,308.91
07/08/25	226	NJZ Computer Services, LLC	w/e 6.6.25, 6.13.25, 6.20.25, and 6.27.25	2990-000		2,100.00	163,208.91
07/08/25	227	TPS-West, LLC	80% fees/100% expenses (Jan 2025 MFA - Dkt. 2468)	3410-000		2,413.54	160,795.37
07/08/25	228	TRDkyes & Co, LLC	June 2025	2990-000		10,000.00	150,795.37
07/15/25	229	Pachulski Stang Ziehl & Jones LLP	M. Warner June Monthly Fee Statement (92328) - 80% fees/100% expenses	2100-000		1,990.72	148,804.65
07/16/25			WIRE FROM STEWART ROBBINS BROW		16,462.22		165,266.87
			\$16,462.22				
08/11/25	230	NJZ Computer Services, LLC	w/e 7.4.25, 7.11.25, 7.18.25, 7.25.25, 8.1.25	2990-000		! 2,775.00	162,491.87
08/11/25	231	Pride Oil & Gas Properties, Inc.	Inv. #125004	2990-000		! 1,905.50	160,586.37
08/11/25	232	TRDkyes & Co, LLC	July 2025	2990-000		! 18,000.00	142,586.37
Page Subtotals:					\$16,462.22	\$391,324.77	

Form 2  
Cash Receipts And Disbursements Record

Page: 8

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*9687 Checking

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
<div><div>Account</div><div><div>Balance Forward0.00</div><div>5Deposits3,139.04132</div><div>0Interest Postings0.002</div><div>Subtotal3,139.041</div><div>3Adjustments In2,095,850.27</div><div>2Transfers In1,325,000.00</div><div>Total3,423,989.31</div></div><div><div>Checks2,381,392.94</div><div>Adjustments Out800,010.00</div><div>Transfers Out100,000.00</div><div>Total3,281,402.94</div></div></div>							
Page Subtotals:					\$0.00	\$0.00	

Form 2  
Cash Receipts And Disbursements Record

Page: 9

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*5635 Cash Collateral

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
07/18/24		Badger Energy LLC	Cash Collateral - Representing Revenue	1290-000	2.57		2.57
07/18/24		Poston Minerals LLC	Cash Collateral - Representing Revenue	1290-000	134.80		137.37
07/18/24		Paylocity Corporation	Cash Collateral - COBRA Reimbursement	1290-000	4,661.44		4,798.81
07/18/24		Paylocity Corporation	Cash Collateral - COBRA Reimbursement	1290-000	14,690.79		19,489.60
07/18/24		Paylocity Corporation	Cash Collateral - COBRA Reimbursement	1290-000	7,872.52		27,362.12
10/18/24		Natural Resources Worldwide, LLC	NRW Transfer	1290-000	25,000.00		52,362.12
01/30/25		To Account #*****9687	Deposited in Cash Collateral Account in error.	9999-000		25,000.00	27,362.12
02/25/25		Stone Pigman Walther Witmann LLC	Funds held by former special counsel	1290-000	108,093.42		135,455.54

Account					
	Balance Forward	0.00			
7	Deposits	160,455.54	0	Checks	0.00
0	Interest Postings	0.00	0	Adjustments Out	0.00
	Subtotal	160,455.54	1	Transfers Out	25,000.00
0	Adjustments In	0.00		Total	25,000.00
0	Transfers In	0.00			
	Total	160,455.54			

Page Subtotals: \$0.00 \$0.00



Form 2  
Cash Receipts And Disbursements Record

Page: 10

Case No.:23-90324

Case Name:MLCJR LLC

L.L.C. Cox Oil Offshore

Taxpayer ID #:\*\*-\*\*\*0875

For Period Ending:08/18/2025

Trustee Name:Michael D. Warner (631470)

Bank Name:Metropolitan Commercial Bank

Account #:\*\*\*\*\*3772 DOJ Settlement Funds

Blanket Bond (per case limit):N/A

Separate Bond (if applicable):\$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
10/09/24		To Account #*****3772	Settlement Funds Transfer	9999-000	100,000.00		100,000.00
12/31/24	300001	Bureau of Ocean Energy Management	DOJ Settlement - Abandonment Motion	2990-000		100,000.00	0.00

Account				
	Balance Forward	0.00		
0	Deposits	0.00	1	Checks100,000.00
0	Interest Postings	0.00	0	Adjustments Out0.00
	Subtotal	0.00	0	Transfers Out0.00
0	Adjustments In	0.00		Total100,000.00
1	Transfers In	100,000.00		
	Total	100,000.00		

Page Subtotals: \$0.00 \$0.00

Form 2  
Cash Receipts And Disbursements Record

Page: 11

Case No.: 23-90324

Case Name: MLCJR LLC

L.L.C. Cox Oil Offshore

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*7203 WT Asset Sale Proceeds

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
03/11/25		Stewart Robbins Brown & Altazan, LLC	WIRE FROM STEWART ROBBINS BROW	1290-000	250,000.00		250,000.00

Account					
	Balance Forward	0.00			
0	Deposits	0.00	0	Checks	0.00
0	Interest Postings	0.00	0	Adjustments Out	0.00
	Subtotal	0.00	0	Transfers Out	0.00
1	Adjustments In	250,000.00		Total	0.00
0	Transfers In	0.00			
	Total	250,000.00			

Page Subtotals: \$0.00 \$0.00

Form 2  
Cash Receipts And Disbursements Record

Page: 12

Case No.: 23-90324

Case Name: MLCJR LLC

Taxpayer ID #: \*\*-\*\*\*0875

For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)

Bank Name: Metropolitan Commercial Bank

Account #: \*\*\*\*\*1353 Hedron Settlement Account

Blanket Bond (per case limit): N/A

Separate Bond (if applicable): \$4,000,000.00

1	2	3	4		5	6	7
Trans. Date	Check or Ref. #	Paid To / Received From	Description of Transaction	Uniform Tran. Code	Deposit \$	Disbursement \$	Account Balance
05/13/25		FriLOT LLC IOLTA	WIRE FROM FRILOT LLC IOLTA	1290-000	11,000,000.00		11,000,000.00
05/13/25		Incoming Wire - Hedron	Incoming Wire - Hedron	1290-000	11,000,000.00		22,000,000.00
05/13/25		Amarillo National Bank	WIRE TO AMARILLO NATIONAL BANK	8500-002		3,316,666.00	18,683,334.00
05/13/25		Fishman Haygood, LLP	WIRE TO IOLTA FISHMAN HAYGOOD LLP	8500-002		3,550,000.00	15,133,334.00
05/13/25		Hall Maines Lugin PC IOLTA Trust Account	WIRE TO HALL MAINES LUGRIN PC IOL	8500-002		2,833,334.00	12,300,000.00
05/13/25		Incoming Wire - Hedron	Incoming Wire - Hedron	1290-000	-11,000,000.00		1,300,000.00
05/14/25		To Account #*****9687	Remaining balance from Hedron Settlement Sub-Account	9999-000		1,300,000.00	0.00

Account				
	Balance Forward	0.00		
0	Deposits	0.00	0	Checks 0.00
0	Interest Postings	0.00	4	Adjustments Out 20,700,000.00
	Subtotal	0.00	1	Transfers Out 1,300,000.00
2	Adjustments In	22,000,000.00		Total 22,000,000.00
0	Transfers In	0.00		
	Total	22,000,000.00		

Page Subtotals: \$11,000,000.00 \$11,000,000.00

Form 2  
Cash Receipts And Disbursements Record

Page: 13

Case No.: 23-90324  
Case Name: MLCJR LLC  
L.L.C. Cox Oil Offshore  
Taxpayer ID #: \*\*-\*\*\*0875  
For Period Ending: 08/18/2025

Trustee Name: Michael D. Warner (631470)  
Bank Name: Metropolitan Commercial Bank  
Account #: \*\*\*\*\*1353 Hedron Settlement Account  
Blanket Bond (per case limit): N/A  
Separate Bond (if applicable): \$4,000,000.00

Net Receipts:	\$13,509,434.85
Plus Gross Adjustments:	\$0.00
Less Payments to Debtor:	\$0.00
Less Other Noncompensable Items:	\$10,500,000.00
Net Estate:	\$3,009,434.85

TOTAL - ALL ACCOUNTS	NET DEPOSITS	NET DISBURSEMENTS	ACCOUNT BALANCES
*****9687 Checking	\$2,098,979.31	\$3,181,392.94	\$142,586.37
*****5635 Cash Collateral	\$160,455.54	\$0.00	\$135,455.54
*****3772 DOJ Settlement Funds	\$0.00	\$100,000.00	\$0.00
*****7203 WT Asset Sale Proceeds	\$250,000.00	\$0.00	\$250,000.00
*****1353 Hedron Settlement Account	\$11,000,000.00	\$9,700,000.00	\$0.00
	\$13,509,434.85	\$12,981,392.94	\$528,041.91